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CENTRAL DISTRICT OF CALIFORNIA  
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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2018 Grand Jury

18CR00892 FAB

CR No.

UNITED STATES OF AMERICA,

Plaintiff,

v.

LEONEL LAREDO,  
aka "Wizard,"  
aka "Wiz,"  
aka "W,"  
aka "Leo,"  
aka "Dad,"

FRANCISCO RODRIGUEZ,  
aka "Dodger,"  
aka "D,"  
aka "Son,"

LOUIE MONTANEZ,  
aka "Bird,"

JORGE GARCIA,  
aka "Lil Blazer,"  
aka "Lil B,"  
aka "LB,"  
aka "Little Blaze,"  
aka "Mona,"

aka "Gloria's Little Sister,"

CHRISTOPHER GONZALEZ,  
aka "Solo,"  
aka "Soliman,"  
aka "Lil Psycho,"  
aka "Soli,"

FRANK GOMEZ,  
aka "Crazy Boy,"  
aka "CB,"

RENE MOISES ASCENCIO,  
aka "Player,"

I N D I C T M E N T

[18 U.S.C. § 1962(d): Racketeer Influenced and Corrupt Organizations Conspiracy; 18 U.S.C. §§ 1959(a) (3), (6): Violent Crime in Aid of Racketeering; 21 U.S.C. § 846: Conspiracy to Distribute and to Possess with Intent to Distribute Controlled Substances; 21 U.S.C. §§ 841(a) (1), (b) (1) (A), (b) (1) (B), (b) (1) (C): Possession with Intent to Distribute and Distribution of Controlled Substances; 21 U.S.C. § 843(b): Use of a Communication Facility in the Commission of a Drug Trafficking Offense; 18 U.S.C. § 924(c) (1) (A): Possess, Use, Carry, Brandish, and/or Discharge a Firearm in Furtherance of, and During and in Relation to, a Crime of Violence or a Drug Trafficking Crime; 18 U.S.C. § 922(g) (1): Felon in Possession of a Firearm and Ammunition; 18 U.S.C. § 2(a): Aiding and Abetting; 18 U.S.C. §§ 924(d) (1), 1963(a) (3), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c): Criminal Forfeiture]

1 JESUS ROMERO,  
2 aka "Spanky,"  
3 LUIS ALFREDO ROMERO,  
4 aka "Pest,"  
5 NOE MARAVILLA BAROCIO,  
6 aka "Baby Thumper,"  
7 aka "Noe Barocio Maravilla,"  
8 EDUARDO MADERA,  
9 aka "Huero,"  
10 SAMUEL FLORES MEJIA,  
11 aka "Menace,"  
12 VICTOR SILLAS,  
13 aka "Big Show,"  
14 SABY PINEDA,  
15 aka "Sandra,"  
16 aka "Daniela Saby Pineda,"  
17 JOSHUA GONZALEZ,  
18 aka "Triste,"  
19 aka "Grande,"  
20 ARMANDO GARCIA,  
21 aka "Mando,"  
22 GUADALUPE REGALADO,  
23 aka "Lupillo,"  
24 JOSE ALVAREZ,  
25 aka "Vecino,"  
26 EULOGIO RUVALCABA,  
27 aka "Lou,"  
28 JENNIFER BANUELOS,  
29 aka "Jenny,"  
30 ELIZABETH PAULINE CARBAJAL,  
31 aka "Liz,"  
32 aka "Elizabeth Parker,"  
33 MARTHA ROCA,  
34 aka "Martha Ofelia,"  
35 IAN CARDENAS,  
36 aka "Samuel Camacho,"  
37 aka "Fats,"  
38 VICTOR NOE HERNANDEZ,  
39 aka "Sneaks,"  
40 aka "Pelon,"  
41 GONZALO CERVANTES,  
42 aka "Gonzo," and  
43 CARLOS MARROQUIN,  
44 aka "Bullet,"

45 Defendants.

46 The Grand Jury charges:

47 INTRODUCTORY ALLEGATIONS

1 A. THE RACKETEERING ENTERPRISE

2       1. At all times relevant to this Indictment, defendants LEONEL  
 3 LAREDO, also known as ("aka") "Wizard," aka "Wiz," aka "W," aka  
 4 "Leo," aka "Dad" ("LAREDO"), FRANCISCO RODRIGUEZ, aka "Dodger," aka  
 5 "D," aka "Son" ("RODRIGUEZ"), LOUIE MONTANEZ, aka "Bird"  
 6 ("MONTANEZ"), JORGE GARCIA, aka "Lil Blazer," aka "Lil B," aka "LB,"  
 7 aka "Little Blaze," aka "Mona," aka "Gloria's Little Sister" ("J.  
 8 GARCIA"), CHRISTOPHER GONZALEZ, aka "Solo," aka "Soliman," aka "Lil  
 9 Psycho," aka "Soli" ("C. GONZALEZ"), FRANK GOMEZ, aka "Crazy Boy,"  
 10 aka "CB" ("GOMEZ"), RENE MOISES ASCENCIO, aka "Player" ("ASCENCIO"),  
 11 JESUS ROMERO, aka "Spanky" ("J. ROMERO"), LUIS ALFREDO ROMERO, aka  
 12 "Pest" ("L. ROMERO"), NOE MARAVILLA BAROCIO, aka "Baby Thumper," aka  
 13 "Noe Barocio Maravilla" ("BAROCIO"), EDUARDO MADERA, aka "Huero"  
 14 ("MADERA"), SAMUEL FLORES MEJIA, aka "Menace" ("MEJIA"), VICTOR  
 15 SILLAS, aka "Big Show" ("SILLAS"), SABY PINEDA, aka "Sandra," aka  
 16 "Daniela Saby Pineda" ("PINEDA"), JOSHUA GONZALEZ, aka "Triste," aka  
 17 "Grande" ("J. GONZALEZ"), ARMANDO GARCIA, aka "Mando" ("A. GARCIA"),  
 18 GUADALUPE REGALADO, aka "Lupillo" ("REGALADO"), JOSE ALVAREZ, aka  
 19 "Vecino" ("ALVAREZ"), EULOGIO RUVALCABA, aka "Lou" ("RUVALCABA"),  
 20 JENNIFER BANUELOS, aka "Jenny" ("BANUELOS"), ELIZABETH PAULINE  
 21 CARBAJAL, aka "Liz," aka "Elizabeth Parker" ("CARBAJAL"), MARTHA  
 22 ROCA, aka "Martha Ofelia" ("ROCA"), IAN CARDENAS, aka "Samuel  
 23 Camacho," aka "Fats" ("CARDENAS"), VICTOR NOE HERNANDEZ, aka  
 24 "Sneaks," aka "Pelon" ("HERNANDEZ"), GONZALO CERVANTES, aka "Gonzo"  
 25 ("CERVANTES"), and CARLOS MARROQUIN, aka "Bullet" ("MARROQUIN")  
 26 (collectively, "defendants"), and others known and unknown to the  
 27 Grand Jury, were members and associates of a criminal organization  
 28 engaged in, among other things, attempted murder, assaults,

1 trafficking in controlled substances, money laundering, illegal  
2 gambling, and extortion. At all relevant times, this organization,  
3 known as the Florencia 13 criminal street gang (hereinafter, the "F13  
4 Gang"), operated in the Central District of California, and  
5 elsewhere. The F13 Gang, including its leadership, members, and  
6 associates, constituted an "enterprise," as that term is defined in  
7 Title 18, United States Code, Section 1961(4), that is, a group of  
8 individuals associated in fact, although not a legal entity, which is  
9 engaged in, and the activities of which affect, interstate and  
10 foreign commerce. The enterprise constitutes an ongoing organization  
11 whose members function as a continuing unit for a common purpose of  
12 achieving the objectives of the enterprise.

13 B. BACKGROUND OF THE F13 GANG

14 At all times relevant to this Indictment:

15 2. The F13 Gang was a multi-generational gang founded in Los  
16 Angeles, California in the early 1950s. The gang began as a small  
17 group of individuals who lived in and around the area of Florence  
18 Boulevard, in and near Los Angeles, California. Initially, the gang  
19 was primarily involved in street robberies, drug sales, and fighting  
20 with rival gang members in "turf battles." Through the years, the  
21 gang dramatically increased its membership by absorbing smaller, less  
22 powerful local gangs.

23 3. There were at least 22 cliques, or subsets, of the F13 Gang  
24 that together control an area of approximately three square miles in  
25 and around the unincorporated areas of South Los Angeles County.  
26 Examples of these cliques included the Gangsters, 64th Street, the  
27 Termites, the Tiny Locos, Bear Street, the Malditos, and the HP  
28 (Huntington Park) Locos. The overall number of F13 Gang cliques has

1 changed over the years as new cliques have been allowed to join the  
2 gang, and others have been expelled. While the F13 Gang's  
3 "territory," therefore, has changed over time, it historically has  
4 been contained within the approximate area bordered by the 10 freeway  
5 to the North, Imperial Highway to the South, the 110 freeway to the  
6 West, and the 710 freeway to the East; and it included at least the  
7 unincorporated Florence-Firestone neighborhood (also known as  
8 Florence-Graham) and parts of several nearby cities, such as  
9 Huntington Park, South Gate, Maywood, Bell, and Lynwood. Based on  
10 the strength of its numbers and its reputation for violence, the F13  
11 Gang controlled drug trafficking and other illegal activities within  
12 its territory.

13 4. The F13 Gang continually was engaged in the distribution of  
14 multiple controlled substances, including, but not limited to,  
15 methamphetamine, heroin, cocaine, and marijuana. In addition to  
16 supplying drug-using customers, members and associates of the F13  
17 Gang regularly sold distributable amounts of drugs to each other and  
18 to others who they believe to be "street-level" drug dealers. F13  
19 Gang members and associates also engaged in efforts to smuggle  
20 controlled substances into California State Prisons and the Los  
21 Angeles County Jail ("LACJ") system for use by its members and  
22 associates and for sale to the broader inmate population.

23 5. To support their drug trafficking and racketeering  
24 activities, and to maintain control over their claimed "territory,"  
25 F13 Gang members and associates maintained a ready supply of  
26 firearms, including handguns and rifles. They also sold such weapons  
27 for profit. Firearms also were often discarded or destroyed after  
28 being used to commit acts of violence on behalf of the enterprise, so

1 the F13 Gang regularly engaged in continued gun trafficking to ensure  
2 that it maintained ready access to firearms at all times. Being  
3 publicly known to sell, and therefore possess, numerous firearms  
4 served the additional purpose of supporting the F13 Gang's reputation  
5 for violence and intimidation.

6. The F13 Gang was controlled by members and associates of  
7 the "Mexican Mafia," or "La Eme." The Mexican Mafia was an organized  
8 group of individuals who controlled much of the drug distribution and  
9 other criminal activities within California State Prisons, local  
10 county jails, and some federal prisons. Members of the Mexican Mafia  
11 came from the ranks of local street gangs, including the F13 Gang.  
12 In return for allowing local street gangs to maintain control over  
13 their territories and for protecting the gangs' members and  
14 associates during periods of incarceration, the Mexican Mafia  
15 required the gangs to collect and pay "taxes" on all drug trafficking  
16 and other illicit and illegal conduct taking place in those  
17 territories (hereinafter, "extortionate taxes"). These illicit funds  
18 were intended to be controlled by, and were often held in trust by,  
19 gang members and associates for the Mexican Mafia member(s) in charge  
20 of a particular area. Members and associates of the F13 Gang,  
21 therefore, regularly paid extortionate taxes to the Mexican Mafia  
22 members who oversaw the gang; and the collection of extortionate  
23 taxes from drug dealers operating within the F13 Gang's territory was  
24 a primary task of the gang's leadership on the streets, as was  
25 punishing individuals who failed to pay the requisite extortionate  
26 taxes.

27. There were four Mexican Mafia members who maintained  
28 leadership roles over the F13 Gang: defendant LAREDO, unindicted co-

1 conspirator number 1 ("Co-conspirator 1"), unindicted co-conspirator  
2 number 2 ("Co-conspirator 2"), and unindicted co-conspirator number 3  
3 ("Co-conspirator 3"). Co-conspirator 1 presently is serving a term  
4 of life imprisonment without the possibility of parole. In 2004, Co-  
5 conspirator 1 issued written "reglas," or rules, from his prison cell  
6 at Pelican Bay State Prison that were intended to govern all F13 Gang  
7 members and associates. By way of these rules and later directives,  
8 Co-conspirator 1 commanded certain senior gang members and other  
9 select individuals to assume leadership positions within the F13  
10 Gang's "territory." These persons ("shot callers") were then ordered  
11 to coordinate the illegal distribution of drugs and other criminal  
12 activities, to ensure that extortionate taxes were collected, and  
13 otherwise to oversee their respective portions of the F13 Gang's  
14 territory, such as by resolving disputes both among F13 Gang members  
15 and associates and with members of other Los Angeles gangs. Shot  
16 callers likewise were charged with exposing and punishing F13 Gang  
17 members, as well as others residing in F13 Gang-controlled territory,  
18 who were identified as having cooperated with law enforcement or who  
19 otherwise violated the F13 Gang's rules. Co-conspirator 2 also  
20 presently is serving a term of life imprisonment without the  
21 possibility of parole. Co-conspirator 3 presently is in federal  
22 custody at the United States Penitentiary, Administrative Maximum  
23 Facility, in Fremont County, Colorado.

24 8. At some point after 2007, defendant LAREDO, who was in  
25 state custody along with Co-conspirator 1, became a leader of the F13  
26 Gang. Defendant LAREDO, who is presently in federal custody in  
27 connection with racketeering and drug convictions related to his F13  
28 Gang activities, was, and is, able to disseminate instructions to the

1 F13 Gang's membership to maintain control over drug trafficking and  
2 other criminal activities within the gang's territory.

3       9. The members of the leadership of the F13 Gang who are  
4 incarcerated are able to disseminate instructions to the gang's  
5 membership and to maintain control over drug trafficking and other  
6 criminal activities within the gang's territory through emails from  
7 inmates to both in-custody and out-of-custody members and associates  
8 and by telephone calls from inmates to both in-custody and out-of-  
9 custody members and associates (*i.e.*, "jail calls").

10 C. PURPOSES OF THE ENTERPRISE

11       10. The purposes of the F13 Gang included, but were not limited  
12 to, the following:

13           a. Enriching defendant LAREDO, Co-conspirator 1, Co-  
14 conspirator 2, and Co-conspirator 3, through, among other things, the  
15 remittance of the proceeds of extortionate taxes to family members,  
16 friends, and associates of these four top leaders of the F13 Gang.

17           b. Enriching the members and associates of the F13 Gang  
18 through, among other things, the control of, and participation in,  
19 the trafficking of controlled substances in F13 Gang territory and  
20 elsewhere, the operation of illegal gambling establishments  
21 ("casitas"), and the collection of extortionate taxes.

22           c. Smuggling controlled substances to F13 Gang members  
23 and associates housed in California State Prisons and the LACJ system  
24 to be distributed to incarcerated individuals.

25           d. Maintaining control over all F13 Gang territory.

26           e. Preserving, protecting, and expanding the power of the  
27 F13 Gang through the use of intimidation, violence, threats of  
28 violence, assault, and murder.

1 D. THE MEANS AND METHODS OF THE ENTERPRISE

2 11. The means and methods by which the defendants, and other  
3 members and associates of the F13 Gang, conducted and participated in  
4 the conduct of the affairs of the F13 Gang included:

5 a. Members and associates of the F13 Gang committed,  
6 attempted to commit, conspired to commit, and threatened to commit  
7 acts of violence, including, without limitation, murder, assaults,  
8 intimidation, and extortion, to preserve, protect, and expand the  
9 enterprise's criminal operations, and to promote discipline and  
10 enforce the rules of the F13 Gang.

11 b. Members and associates of the F13 Gang promoted a  
12 climate of fear through acts of violence and threats to commit acts  
13 of violence.

14 c. Leaders of the F13 Gang disseminated rules and orders  
15 to be followed by all participants in the F13 Gang.

16 d. Members and associates of the F13 Gang engaged in the  
17 trafficking of controlled substances and firearms to generate income  
18 for the enterprise.

19 e. Members and associates of the F13 Gang, with the  
20 permission of the gang's leaders, "taxed" drug sales, firearms  
21 trafficking, and other illegal activity within F13 Gang-controlled  
22 territory to generate income and to control the criminal activity  
23 undertaken within such territory.

24 f. Leaders and shot callers within the F13 Gang  
25 controlled the collection and payment of extortionate taxes to the  
26 Mexican Mafia to preserve, protect, and expand the enterprise's  
27 control of criminal activity undertaken within its territory and to

1 ensure the protection of F13 Gang members and associates who are  
2 incarcerated.

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## 1 COUNT ONE

2 [18 U.S.C. § 1962(d)]

3 Paragraphs 1 through 11 of the Introductory Allegations are  
4 hereby re-alleged and incorporated by reference as though fully set  
5 forth herein.6 A. OBJECT OF THE CONSPIRACY7 Beginning on a date unknown to the Grand Jury, and continuing to  
8 on or about December 20, 2018, in Los Angeles County, within the  
9 Central District of California, and elsewhere, defendants LAREDO,  
10 RODRIGUEZ, MONTANEZ, J. GARCIA, C. GONZALEZ, GOMEZ, ASCENCIO, J.  
11 ROMERO, L. ROMERO, BAROCIO, MADERA, MEJIA, SILLAS, PINEDA, J.  
12 GONZALEZ, and A. GARCIA, Co-conspirator 1, Co-conspirator 2, Co-  
13 conspirator 3, unindicted co-conspirator number 4 ("Co-conspirator  
14 4"), unindicted co-conspirator number 5 ("Co-conspirator 5"),  
15 unindicted co-conspirator number 6 ("Co-conspirator 6"), unindicted  
16 co-conspirator number 7 ("Co-conspirator 7"), unindicted co-  
17 conspirator number 8 ("Co-conspirator 8"), unindicted co-conspirator  
18 number 9 ("Co-conspirator 9"), unindicted co-conspirator number 10  
19 ("Co-conspirator 10"), and others known and unknown to the Grand  
20 Jury, being persons employed by and associated with the F13 Gang  
21 described in Paragraphs 1 through 11 of the Introductory Allegations  
22 of this Indictment, which constitutes an "enterprise," as defined in  
23 Title 18, United States Code, Section 1961(4), which enterprise  
24 engaged in, and the activities of which affected, interstate and  
25 foreign commerce, unlawfully and knowingly combined, conspired,  
26 confederated, and agreed together and with each other to violate  
27 Title 18, United States Code, Section 1962(c), that is, to conduct  
28 and participate, directly and indirectly, in the conduct of the

1 affairs of the enterprise through a pattern of racketeering activity,  
2 as that term is defined in Title 18, United States Code, Sections  
3 1961(1) and 1961(5), consisting of multiple acts involving:

4 (1) murder, in violation of California Penal Code Sections 21a,  
5 31, 182, 187, 189, 190, and 664;

6 (2) extortion, in violation of California Penal Code Sections  
7 21a, 31, 182, 518, 519, 520, 664;

8 multiple acts indictable under:

9 (1) Title 18, United States Code, Section 1955 (relating to  
10 prohibition on illegal gambling businesses);

11 (2) Title 18, United States Code, Section 1956 (relating to the  
12 laundering of monetary instruments);

13 and multiple offenses involving drug trafficking in violation of  
14 Title 21, United States Code, Sections 841(a)(1), 843(b), and 846.

15 It was a further part of the conspiracy that each defendant  
16 agreed that a conspirator would commit at least two acts of  
17 racketeering in the conduct of the affairs of the enterprise.

18 B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE  
19 ACCOMPLISHED

20 The object of the conspiracy was to be accomplished, in  
21 substance, as follows:

22 1. Defendant LAREDO, Co-Conspirator 1, Co-Conspirator 2, and  
23 Co-Conspirator 3, and others known and unknown to the Grand Jury,  
24 would exercise leadership over the F13 Gang on behalf of the Mexican  
25 Mafia from within prison by issuing rules and orders to defendants  
26 RODRIGUEZ, MONTANEZ, J. GARCIA, and C. GONZALEZ, and others known and  
27 unknown to the Grand Jury, regarding, among other things, the  
28 collection of extortionate taxes, the distribution of controlled

1 substances, and who held positions of authority within the F13 Gang  
2 out on the streets.

3 2. Defendants MONTANEZ, J. GARCIA, and C. GONZALEZ, and others  
4 known and unknown to the Grand Jury, would communicate telephonically  
5 with defendants LAREDO and RODRIGUEZ, and others known and unknown to  
6 the Grand Jury, to receive direction regarding the business of the  
7 F13 Gang.

8 3. Defendants LAREDO, RODRIGUEZ, MONTANEZ, J. GARCIA, and C.  
9 GONZALEZ, and others known and unknown to the Grand Jury, would  
10 direct drug trafficking, acts of violence, and other criminal  
11 activities within F13 Gang territory; supervise the collection of  
12 extortionate taxes; and mediate disputes both among the F13 Gang's  
13 members and associates and with members of other gangs.

14 4. Defendants MONTANEZ, J. GARCIA, C. GONZALEZ, GOMEZ,  
15 ASCENCIO, J. ROMERO, L. ROMERO, BAROCIO, MADERA, SILLAS, and PINEDA,  
16 Regalado, Alvarez, Ruvalcaba, Banuelos, Carbajal, Roca, Cardenas,  
17 Hernandez, Cervantes, and Marroquin, and others known and unknown to  
18 the Grand Jury, would supply F13 Gang members and associates, and  
19 others, with distributable amounts of controlled substances,  
20 including, but not limited to, methamphetamine, heroin, cocaine, and  
21 marijuana.

22 5. Defendants MEJIA and SILLAS, and Marroquin, and others  
23 known and unknown to the Grand Jury, would sell firearms, including  
24 handguns and rifles, to members and associates of the F13 Gang.

25 6. Defendants J. GARCIA, C. GONZALEZ, J. ROMERO, L. ROMERO,  
26 MADERA, MEJIA, and SILLAS, and Marroquin, and others known and  
27 unknown to the Grand Jury, would possess firearms and ammunition to

1 further the drug trafficking and other criminal activities of the F13  
2 Gang.

3       7. Defendants J. GARCIA and PINEDA, and others known and  
4 unknown to the Grand Jury, would operate "casitas" within F13 Gang  
5 territory, and elsewhere, from which F13 Gang members and associates  
6 would distribute illegal controlled substances and engage in other  
7 criminal activities, including illegal gambling.

8       8. Defendants MONTANEZ, J. GARCIA, C. GONZALEZ, GOMEZ,  
9 ASCENCIO, J. ROMERO, L. ROMERO, MADERA, MEJIA, SILLAS, and J.  
10 GONZALEZ, and Cardenas, and others known and unknown to the Grand  
11 Jury, would participate in the disciplining of members and associates  
12 of the F13 Gang - or others who are deemed to have interfered with  
13 the gang's criminal activities - including, without limitation,  
14 through the planning of assaults and murders of such individuals.

15       9. Defendants J. GARCIA and GOMEZ, and Ruvalcaba, Banuelos,  
16 Carbajal, and Roca, and others known and unknown to the Grand Jury,  
17 would participate in efforts by F13 Gang members and associates to  
18 smuggle controlled substances, such as heroin, into California State  
19 Prisons.

20       10. Defendants MONTANEZ, J. GARCIA, C. GONZALEZ, GOMEZ,  
21 ASCENCIO, J. ROMERO, L. ROMERO, BAROCIO, SILLAS, and A. GARCIA, and  
22 others known and unknown to the Grand Jury, would collect  
23 extortionate taxes from the sales of controlled substances and other  
24 profitable illegal activities within F13 Gang-controlled territory.

25       C. OVERT ACTS

26       In furtherance of the racketeering conspiracy and to accomplish  
27 the object of the racketeering conspiracy, defendants LAREDO,  
28 RODRIGUEZ, MONTANEZ, J. GARCIA, C. GONZALEZ, GOMEZ, ASCENCIO, J.

1 ROMERO, L. ROMERO, BAROCIO, MADERA, MEJIA, SILLAS, PINEDA, and A.  
2 GARCIA, and others known and unknown to the Grand Jury, committed and  
3 caused to be committed various overt acts, on or about the following  
4 dates, within the Central District of California, and elsewhere,  
5 including, but not limited to, the following:

6 1. On December 6, 2012, defendant J. GONZALEZ possessed  
7 methamphetamine for purposes of distribution in F13 Gang territory.

8 2. On April 5, 2013, defendant J. GONZALEZ stole a car in F13  
9 Gang territory.

10 3. On April 19, 2014, defendant J. GONZALEZ possessed a  
11 firearm in F13 Gang territory.

12 4. On May 15, 2015, defendant J. GONZALEZ possessed a firearm  
13 in F13 Gang territory.

14 5. On May 11, 2016, defendant C. GONZALEZ sold approximately  
15 52 grams of methamphetamine for \$400 to an individual who defendant  
16 C. GONZALEZ believed was a methamphetamine customer, but who was, in  
17 fact, a confidential human source working with law enforcement ("CHS-  
18").

19 6. On May 11, 2016, defendant C. GONZALEZ, using coded  
20 language during an in-person conversation, told CHS-1 that he wanted  
21 to go to a marijuana shop to collect extortionate taxes from the  
22 marijuana shop.

23 7. On May 23, 2016, defendant C. GONZALEZ sold approximately  
24 436 grams of methamphetamine to CHS-1 for \$2,600.

25 8. On September 13, 2016, defendant MADERA, using coded  
26 language during an in-person conversation, told CHS-1 that he could  
27 sell CHS-1 one pound of methamphetamine.

1       9. On October 12, 2016, defendants LAREDO and J. GARCIA, using  
2 coded language in a telephone conversation, discussed the cost,  
3 distribution, and sale of controlled substances that defendant LAREDO  
4 previously had provided to defendant C. GONZALEZ.

5       10. On October 12, 2016, defendant J. GARCIA, using coded  
6 language in a telephone conversation, told defendant LAREDO that, if  
7 defendant J. GARCIA were to go to prison, defendant C. GONZALEZ would  
8 serve as the shot-caller of the F13 Gang.

9       11. On October 17, 2016, defendants LAREDO and J. GARCIA, using  
10 coded language in a telephone conversation, discussed the cost,  
11 distribution, and sale of controlled substances in the possession of  
12 defendant C. GONZALEZ.

13       12. On October 21, 2016, defendants LAREDO and J. GARCIA, using  
14 coded language in a telephone conversation, discussed the purchase  
15 and sale of controlled substances, as well as the benefit of breaking  
16 up larger quantities of controlled substances into smaller quantities  
17 to make more money through increased volume of sales.

18       13. On October 23, 2016, defendant LAREDO, using coded language  
19 in a telephone conversation, told defendant J. GARCIA that it would  
20 be more profitable to break up larger quantities of controlled  
21 substances into smaller quantities to make more money through  
22 increased volume of sales.

23       14. On October 25, 2016, defendants LAREDO and C. GONZALEZ,  
24 using coded language in a telephone conversation, discussed the  
25 benefit of breaking up larger quantities of controlled substances  
26 into smaller quantities; the availability of F13 Gang members who  
27 could sell the smaller quantities of controlled substances; and the

1 eventual distribution of drug proceeds to defendant LAREDO, Co-  
2 Conspirator 1, Co-Conspirator 2, and Co-Conspirator 3.

3 15. On October 30, 2016, defendants LAREDO and C. GONZALEZ,  
4 using coded language in a telephone conversation, discussed forming  
5 an alliance between the F13 Gang and two rival gangs.

6 16. On November 1, 2016, defendants LAREDO and J. GARCIA, using  
7 coded language in a telephone conversation, discussed the acquisition  
8 of controlled substances for defendant C. GONZALEZ.

9 17. On November 1, 2016, defendants LAREDO and J. GARCIA, using  
10 coded language in a telephone conversation, discussed the delivery of  
11 controlled substances to defendant C. GONZALEZ for further  
12 distribution.

13 18. On November 4, 2016, defendant LAREDO, using coded language  
14 in a telephone conversation, told defendant C. GONZALEZ that he had  
15 arranged for the delivery of a controlled substance to defendant C.  
16 GONZALEZ for further distribution.

17 19. On November 5, 2016, defendant LAREDO, using coded language  
18 in a telephone conversation, told defendant J. GARCIA that defendant  
19 C. GONZALEZ was going to deliver a box of controlled substances to  
20 defendant J. GARCIA.

21 20. On November 12, 2016, defendants LAREDO and J. GARCIA,  
22 using coded language in a telephone conversation, discussed obtaining  
23 controlled substances for distribution from Ruvalcaba.

24 21. On November 14, 2016, defendants LAREDO and C. GONZALEZ,  
25 using coded language in a telephone conversation, discussed the  
26 acquisition, transportation, and receipt of controlled substances.

27 22. On November 14, 2016, defendants LAREDO and C. GONZALEZ,  
28 using coded language in a telephone conversation, discussed the

1 distribution of money to defendant LAREDO, Co-conspirator 1, Co-  
2 conspirator 2, and Co-conspirator 3.

3 23. On December 10, 2016, defendant C. GONZALEZ, using coded  
4 language in a telephone conversation, told defendant J. GARCIA that  
5 he collected \$300 per week of extortionate taxes from a "casita" on  
6 Hoover Street in F13 Gang territory, and \$100 per week of  
7 extortionate taxes from an individual operating slot machines at the  
8 same "casita."

9 24. On December 10, 2016, defendants C. GONZALEZ, ASCENCIO, J.  
10 ROMERO, and BAROCIO, and other unidentified co-conspirators, went to  
11 a "casita" on Hoover Street in F13 Gang territory to discuss and  
12 collect extortionate payments from the "casita."

13 25. On December 11, 2016, defendant J. GARCIA, using coded  
14 language in a telephone conversation, told defendant C. GONZALEZ that  
15 defendants J. GARCIA, J. ROMERO, and MADERA assaulted an F13 Gang  
16 member earlier that day for not following F13 Gang rules.

17 26. On December 11, 2016, defendant J. GARCIA, using coded  
18 language in a telephone conversation, told defendant C. GONZALEZ that  
19 he was imposing a \$1,000 fine against an F13 Gang member who violated  
20 F13 Gang rules.

21 27. On December 14, 2016, defendants RODRIGUEZ and J. GARCIA,  
22 using coded language in a telephone conversation, discussed the  
23 collection of extortionate taxes for defendant LAREDO.

24 28. On December 15, 2016, defendants J. GARCIA and GOMEZ, using  
25 coded language in a telephone conversation, discussed their revenues  
26 from drug sales.

27 29. On December 15, 2016, defendant C. GONZALEZ shot at and  
28 attempted to murder J.G., a rival gang member.

1       30. On December 16, 2016, defendant J. GARCIA, using coded  
2 language in a telephone conversation, instructed defendant ASCENCIO  
3 to collect \$2,000 in extortionate taxes.

4       31. On December 25, 2016, defendants J. GARCIA and GOMEZ, using  
5 coded language in a telephone conversation, discussed smuggling a  
6 controlled substance into the United States from Tijuana, Mexico.

7       32. On December 25, 2016, defendant J. GARCIA and Co-  
8 Conspirator 4, using coded language in a telephone conversation,  
9 discussed the distribution of heroin, with Co-Conspirator 4 noting  
10 that he charged customers \$750 per ounce of heroin.

11       33. On December 25, 2016, defendant J. GARCIA, using coded  
12 language in a telephone conversation, told Co-conspirator 4 that he  
13 was going to obtain four ounces of heroin, of which three ounces were  
14 for Co-conspirator 2 and one ounce was for Co-conspirator 4.

15       34. On December 26, 2016, defendants RODRIGUEZ and J. GARCIA,  
16 using coded language in a telephone conversation, discussed the  
17 weekly collection of \$300 of extortionate taxes from a "casita" in  
18 F13 Gang territory.

19       35. On December 26, 2016, defendants J. GARCIA and ASCENCIO,  
20 using coded language in a telephone conversation, discussed the  
21 collection of a \$2,000 extortionate tax from an F13 Gang member for  
22 violating F13 Gang rules.

23       36. On December 27, 2016, defendant J. GARCIA and Co-  
24 conspirator 4, using coded language in a telephone conversation,  
25 discussed how Roca would transport heroin whenever defendant J.  
26 GARCIA was ready to accept delivery.

27       37. On December 27, 2016, defendant J. GARCIA, using coded  
28 language in a telephone conversation, again told Co-conspirator 4

1 that he was going to obtain four ounces of heroin, of which three  
2 ounces were for Co-conspirator 2 and one ounce was for Co-conspirator  
3 4.

4 38. On December 30, 2016, defendant J. GARCIA, using coded  
5 language in a telephone conversation, told Co-conspirator 4 that he  
6 was going to send Co-conspirator 4 and Co-conspirator 2 the heroin  
7 they previously discussed in the next week.

8 39. On December 30, 2016, defendant J. GARCIA obtained from Co-  
9 conspirator 4 Roca's phone number to facilitate a future drug  
10 transaction.

11 40. On December 30, 2016, defendant J. GARCIA, using coded  
12 language in a telephone conversation, assured Co-conspirator 4 that  
13 he was going to provide Co-conspirator 4 and Co-conspirator 2 with  
14 high quality heroin.

15 41. On December 31, 2016, defendant RODRIGUEZ, using coded  
16 language in a telephone conversation, told defendant J. GARCIA that  
17 an individual from a gang in South Gate, California, had claimed  
18 responsibility for collecting extortionate taxes within F13 Gang  
19 territory, and that the other gang member had the extortionate taxes  
20 available for defendant LAREDO.

21 42. On December 31, 2016, defendant J. GARCIA, using coded  
22 language in a telephone conversation, told defendant ASCENCIO that he  
23 was waiting for defendant ASCENCIO to complete a drug transaction.

24 43. On January 2, 2017, defendant J. GARCIA, using coded  
25 language in a telephone conversation, arranged to meet with Roca to  
26 provide her with heroin at La Barca Restaurantes in Bell, California.

27 44. On January 2, 2017, defendant J. GARCIA, using coded  
28 language in a telephone conversation, told Co-conspirator 4 that he

1 had spoken with Roca and that the transfer of heroin would happen the  
2 following day.

3       45. On January 3, 2017, defendant J. GARCIA, using coded  
4 language in a telephone conversation, told Roca that he was on his  
5 way to meet her at La Barca Restaurantes in Bell, California to  
6 conduct a drug transaction.

7       46. On January 3, 2017, defendant J. GARCIA provided Roca with  
8 approximately four ounces of heroin.

9       47. On January 3, 2017, defendant J. GARCIA, using coded  
10 language in a telephone conversation, discussed how Roca was pulled  
11 over by law enforcement, that law enforcement did not find any  
12 controlled substances in her car, and that, if law enforcement had  
13 searched her car more thoroughly, they would have found the drugs and  
14 arrested her.

15       48. On January 5, 2017, defendant J. GARCIA and Co-conspirator  
16 4, using coded language in a telephone conversation, discussed that  
17 Roca currently possessed the heroin that defendant J. GARCIA provided  
18 her on January 3, 2017.

19       49. On January 28, 2017, defendant J. GARCIA and Co-conspirator  
20 4, using coded language in a telephone conversation, discussed  
21 smuggling a controlled substance into prison.

22       50. On January 31, 2017, defendant J. GARCIA and Co-conspirator  
23 2, using coded language in a text message conversation, discussed how  
24 Co-conspirator 2 was running out of heroin to distribute in  
25 California State Prison, Solano, in Vacaville, California.

26       51. On January 31, 2017, defendants J. GARCIA and GOMEZ, using  
27 coded language in a telephone conversation, discussed obtaining  
28 heroin from Ruvalcaba.

1       52. On February 1, 2017, defendants J. GARCIA and A. GARCIA,  
2 using coded language in a telephone conversation, discussed the  
3 collection of \$400 in extortionate taxes.

4       53. On February 1, 2017, defendant J. GARCIA, using coded  
5 language in both a telephone conversation and a text message, told  
6 defendant GOMEZ to call Ruvalcaba to tell him that defendant J.  
7 GARCIA would pay Ruvalcaba for four ounces of heroin.

8       54. On February 1, 2017, defendant GOMEZ, using coded language  
9 in a text message, told defendant J. GARCIA that he had sent a text  
10 message to Ruvalcaba advising Ruvalcaba that defendant J. GARCIA was  
11 waiting to pay Ruvalcaba for four ounces of heroin.

12       55. On February 1, 2017, defendant J. GARCIA and Banuelos,  
13 using coded language in a telephone conversation, discussed how  
14 Banuelos was on her way to distribute approximately four ounces (112  
15 grams) of heroin, which was later seized by law enforcement, to Co-  
16 conspirator 5.

17       56. On February 3, 2017, defendant J. GARCIA, using coded  
18 language in a telephone conversation, told Banuelos that Co-  
19 conspirator 5 had been caught by law enforcement in possession of the  
20 heroin that he had obtained from Ruvalcaba and Banuelos.

21       57. On February 3, 2017, defendant J. GARCIA, using coded  
22 language in a telephone conversation, told Banuelos that defendant J.  
23 GARCIA needed to obtain four more ounces of heroin.

24       58. On February 3, 2017, defendants J. GARCIA and A. GARCIA,  
25 using coded language in a telephone conversation, discussed the  
26 collection of extortionate taxes.

27       59. On February 4, 2017, defendant J. GARCIA, using coded  
28 language in a telephone conversation, told an unindicted co-

1 conspirator, another F13 Gang member, that the unindicted co-  
2 conspirator needed to go to an F13 Gang "casita" so that members of  
3 other gangs would know that the "casita" is controlled by the F13  
4 Gang.

5 60. On February 6, 2017, defendants J. GARCIA and GOMEZ, using  
6 coded language in a telephone conversation, discussed purchasing four  
7 ounces of heroin from Ruvalcaba and Banuelos.

8 61. On February 6, 2017, defendant J. GARCIA and Banuelos,  
9 using coded language in a telephone conversation, discussed  
10 purchasing heroin from Ruvalcaba and Banuelos.

11 62. On February 6, 2017, defendant J. GARCIA, using coded  
12 language in a telephone conversation, told Co-conspirator 6, who was  
13 speaking on behalf of Co-conspirator 2, that defendant J. GARCIA was  
14 getting ready to send four ounces of heroin to Co-conspirator 2, who  
15 was then serving a term of imprisonment at Pelican Bay State Prison,  
16 in Crescent City, California.

17 63. On February 6, 2017, defendant J. GARCIA and Co-conspirator  
18 6, using coded language in a text message conversation, discussed how  
19 Co-conspirator 2 wanted the heroin to arrive the following day during  
20 a specific time range.

21 64. On February 6, 2017, defendant J. GARCIA, using coded  
22 language in a text message, told Co-conspirator 6 that the heroin he  
23 mailed would arrive in Sacramento, California, the following day.

24 65. On February 6, 2017, defendant J. GARCIA and Co-conspirator  
25 6, using coded language in a text message, discussed how Co-  
26 conspirator 2 wanted defendant J. GARCIA to send four ounces of  
27 heroin to D.B. at XX18 53rd Street in Sacramento, California.

28

1       66. On February 6, 2017, defendant J. GARCIA, using coded  
2 language in a telephone conversation, told Banuelos that he mailed  
3 the heroin that he purchased from Ruvalcaba and Banuelos.

4       67. On February 6, 2017, defendant J. GARCIA mailed a package  
5 addressed to D.B. at XX18 53rd Street in Sacramento, California, that  
6 contained approximately 100.7 grams of heroin from a UPS store in  
7 Huntington Park, California.

8       68. On February 10, 2017, defendant ASCENCIO, using coded  
9 language in a text message, told defendant J. GARCIA that he needed  
10 to obtain a firearm.

11       69. On February 10, 2017, defendant J. GARCIA, using coded  
12 language in a text message, told defendant ASCENCIO that he also  
13 needed to obtain a firearm.

14       70. On February 11, 2017, defendant J. GARCIA, using coded  
15 language in a telephone conversation, told Co-conspirator 7 that he  
16 had attempted to send four ounces of heroin to Co-conspirator 2, but  
17 that Co-conspirator 5 had been caught by law enforcement while  
18 transporting the heroin.

19       71. On February 11, 2017, defendant J. GARCIA, using coded  
20 language in a telephone conversation, told Co-conspirator 7 that he  
21 had sent four ounces of heroin to Co-conspirator 2, but that there  
22 was a government hold placed on the package when it arrived in  
23 Sacramento, California.

24       72. On February 19, 2017, defendant J. GARCIA, using coded  
25 language in a telephone conversation, told an unindicted co-  
26 conspirator that defendant J. GARCIA had arranged to have broken  
27 gambling machines fixed and new gambling machines installed at one of  
28 the "casitas" in F13 Gang territory.

1       73. On February 20, 2017, defendant ASCENCIO, using coded  
2 language in a text message, told defendant J. GARCIA that another F13  
3 Gang member owed defendant J. GARCIA \$100 in extortionate taxes.

4       74. On February 22, 2017, defendant J. GARCIA, using coded  
5 language in a telephone conversation, told an unindicted co-  
6 conspirator that, if he learned that a member of the F13 Gang  
7 violated gang rules, then he would ensure that that member was  
8 assaulted.

9       75. On February 23, 2017, defendant A. GARCIA, using coded  
10 language in a telephone conversation, told defendant J. GARCIA that  
11 he was collecting extortionate taxes.

12       76. On February 24, 2017, defendant J. GARCIA and an unindicted  
13 co-conspirator, using coded language in a telephone conversation,  
14 discussed the distribution of a controlled substance.

15       77. On February 25, 2017, defendant J. GARCIA and an unindicted  
16 co-conspirator, using coded language in a telephone conversation,  
17 discussed the distribution of a controlled substance.

18       78. On March 3, 2017, defendant J. GARCIA, using coded language  
19 in a telephone conversation, discussed distributing pound quantities  
20 of a controlled substance with an unindicted co-conspirator.

21       79. On March 9, 2017, defendant GOMEZ, using coded language in  
22 a series of text messages, agreed to sell Co-conspirator 8 three  
23 units of a controlled substance for a price of \$750 per unit.

24       80. On March 9, 2017, defendant GOMEZ, using coded language in  
25 a telephone conversation, agreed to sell Co-conspirator 8 two units  
26 of a controlled substance for a price of \$750 per unit.

1       81. On March 9, 2017, defendant GOMEZ, using coded language in  
2 a telephone conversation, told Banuelos that defendant GOMEZ urgently  
3 needed three units of heroin from Ruvalcaba.

4       82. On March 9, 2017, defendant GOMEZ, using coded language in  
5 a text message, told Ruvalcaba that he urgently needed three units of  
6 a controlled substance.

7       83. On March 9, 2017, defendant GOMEZ and Ruvalcaba, using  
8 coded language in a text message conversation, discussed how  
9 Ruvalcaba could only provide defendant GOMEZ with one unit of a  
10 controlled substance at that time.

11       84. On March 9, 2017, defendant ASCENCIO, using coded language  
12 in a telephone conversation, discussed the distribution of cocaine,  
13 marijuana, and methamphetamine with an associate of the F13 Gang.

14       85. On March 10, 2017, defendant ASCENCIO, using coded language  
15 in a telephone conversation, told defendant J. GARCIA that defendant  
16 ASCENCIO had assaulted an individual who had been in a fight with an  
17 F13 Gang member.

18       86. On March 10, 2017, defendant J. GARCIA, using coded  
19 language in a telephone conversation, instructed defendant ASCENCIO  
20 to ask defendants J. ROMERO and L. ROMERO for help after defendant  
21 ASCENCIO had assaulted an individual who had been in a fight with an  
22 F13 Gang member.

23       87. On March 10, 2017, defendant ASCENCIO, using coded language  
24 in a telephone conversation, told defendant BAROCIO that he had  
25 assaulted an individual who had been in a fight with an F13 Gang  
26 member.

27       88. On March 10, 2017, defendant J. GARCIA, using coded  
28 language in a telephone conversation, told defendant MADERA to help

1 defendant ASCENCIO who had assaulted an individual, who had been in a  
2 fight with an F13 Gang member

3 89. On March 10, 2017, defendant BAROCIO, using coded language  
4 in a telephone conversation, told defendant ASCENCIO that they should  
5 extort the individual who defendant ASCENCIO had assaulted after that  
6 individual had been in a fight with an F13 Gang member.

7 90. On March 10, 2017, defendant ASCENCIO, using coded language  
8 in a telephone conversation, told defendant BAROCIO that he had  
9 attempted to extort an individual for touching a member of the F13  
10 Gang in F13 Gang territory.

11 91. On March 10, 2017, defendant BAROCIO, using coded language  
12 in a telephone conversation, instructed an unindicted co-conspirator  
13 that he needed to advise the individual who touched a member of the  
14 F13 Gang in F13 Gang territory that the F13 Gang will not allow such  
15 behavior.

16 92. On March 10, 2017, defendant J. GARCIA, using coded  
17 language in a telephone conversation, told defendant MADERA that  
18 defendants J. GARCIA, J. ROMERO, and L. ROMERO assaulted an  
19 individual in F13 Gang territory.

20 93. On March 10, 2017, defendants ASCENCIO and L. ROMERO, using  
21 coded language in a telephone conversation, discussed the collection  
22 of extortionate taxes.

23 94. On March 12, 2017, defendant RODRIGUEZ, using coded  
24 language in a telephone conversation, told defendant J. GARCIA that  
25 defendant LAREDO recently had been transferred to a high security  
26 penitentiary in Beaumont, Texas.

27 95. On March 12, 2017, defendant J. GARCIA, using coded  
28 language in a telephone conversation, told defendant RODRIGUEZ that

1 he had a large amount of extortionate taxes and other F13 Gang  
2 proceeds for defendant LAREDO.

3 96. On March 12, 2017, defendant RODRIGUEZ, using coded  
4 language in a telephone conversation, told defendant J. GARCIA not to  
5 send defendant LAREDO too much money at a time.

6 97. On March 12, 2017, defendant J. GARCIA, using coded  
7 language in a telephone conversation, told defendant RODRIGUEZ that  
8 defendant J. GARCIA would send defendant LAREDO approximately \$400 or  
9 \$500 of F13 Gang proceeds within a few days.

10 98. On March 12, 2017, defendant J. GARCIA and an unindicted  
11 co-conspirator, using coded language in a telephone conversation,  
12 discussed instructions from Co-conspirator 2 to assault an F13 Gang  
13 member with outstanding debts.

14 99. On March 13, 2017, defendant RODRIGUEZ, using coded  
15 language in a text message, provided defendant J. GARCIA with  
16 defendant LAREDO's prison address and MoneyGram information.

17 100. On March 13, 2017, defendant GOMEZ, using coded language in  
18 a telephone conversation, told Co-conspirator 8 that he had attempted  
19 to obtain three ounces of a controlled substance.

20 101. On March 13, 2017, defendant GOMEZ, using coded language in  
21 a telephone conversation, told Co-conspirator 8 that he could supply  
22 a pound of a controlled substance for \$2,800, which could then be  
23 resold in prison for at least \$400 or \$500 per ounce.

24 102. On March 13, 2017, defendants J. GARCIA and A. GARCIA,  
25 using coded language in a telephone conversation, agreed to extort  
26 money from an F13 Gang member who had fled from punishment from the  
27 F13 Gang.

28

1       103. On March 14, 2017, defendant GOMEZ received a voicemail  
2 message and a text message from Co-conspirator 8, in which Co-  
3 conspirator 8, using coded language, told defendant GOMEZ that he had  
4 spoken to Carbajal and that he had asked her to pick up three units  
5 of a controlled substance that day, and asked defendant GOMEZ whether  
6 Carbajal could sample a gram of black tar heroin for quality.

7       104. On March 14, 2017, defendant GOMEZ and Carbajal, using  
8 coded language in a telephone conversation, discussed how Carbajal  
9 was on her way to pick up the controlled substance.

10       105. On March 14, 2017, defendant GOMEZ, using coded language in  
11 a telephone conversation, asked Co-conspirator 8 how many units of a  
12 controlled substance defendant GOMEZ should give Carbajal, to which  
13 Co-conspirator 8 replied, "three."

14       106. On March 14, 2017, defendant GOMEZ and Carbajal, using  
15 coded language in a telephone conversation, discussed how Carbajal  
16 was unable to pick up the controlled substance until the following  
17 day.

18       107. On March 14, 2017, defendants J. GARCIA and A. GARCIA,  
19 using coded language in a telephone conversation, discussed  
20 extortionate taxes owed by an F13 Gang member.

21       108. On March 15, 2017, defendants J. GARCIA and GOMEZ, using  
22 coded language in a telephone conversation, discussed defendant  
23 GOMEZ's collection of extortionate taxes and the percentage of these  
24 taxes that defendant GOMEZ was entitled to keep for himself.

25       109. On March 15, 2017, defendant GOMEZ received a text message  
26 from Co-conspirator 8 in which Co-conspirator 8, using coded  
27 language, asked defendant GOMEZ if Carbajal could sample a gram or  
28 half-gram of black tar heroin for quality.

1       110. On March 15, 2017, defendant GOMEZ spoke by phone with Co-  
2 conspirator 8, at which time Co-conspirator 8, using coded language,  
3 reiterated his prior request that Carbajal be permitted to sample a  
4 gram or half-gram of black tar heroin for quality.

5       111. On March 15, 2017, defendant GOMEZ, using coded language in  
6 a telephone conversation, asked Banuelos for a sample of black tar  
7 heroin.

8       112. On March 15, 2017, defendant GOMEZ provided Carbajal with  
9 three units of a controlled substance.

10       113. On March 16, 2017, defendant GOMEZ, using coded language in  
11 a text message, discussed how Carbajal had been arrested, but had  
12 "flushed" the controlled substance that she had purchased the prior  
13 day.

14       114. On March 16, 2017, defendant GOMEZ and Co-conspirator 8,  
15 using coded language in a text message, discussed the attempted  
16 seizure of a controlled substance from Carbajal.

17       115. On March 16, 2017, defendant GOMEZ and Co-conspirator 8,  
18 using coded language in a telephone conversation, discussed the  
19 attempted seizure of a controlled substance from Carbajal.

20       116. On March 16, 2017, defendant J. GARCIA and an unindicted  
21 co-conspirator, using coded language in a telephone conversation,  
22 discussed the collection of extortionate taxes from an individual  
23 operating a "casita" within F13 Gang territory.

24       117. On March 17, 2017, defendant MADERA, using coded language  
25 in a telephone conversation, spoke with an unindicted co-conspirator,  
26 who asked defendant MADERA to come to a location within F13 Gang  
27 territory with a gun.

28

1       118. On March 17, 2017, defendant MADERA possessed a 9mm Colt  
2 Model 2000 pistol, loaded with seven rounds of ammunition, in Los  
3 Angeles, California, within the territory controlled by the F13 Gang.

4       119. On March 18, 2017, defendant ASCENCIO, using coded language  
5 in a text message, told defendant J. GARCIA that he needed to obtain  
6 a firearm.

7       120. On March 18, 2017, defendant J. GARCIA, using coded  
8 language in a text message, told defendant ASCENCIO to call defendant  
9 J. ROMERO to request a firearm.

10       121. On March 19, 2017, defendant ASCENCIO and an unindicted co-  
11 conspirator, using coded language in a telephone conversation,  
12 discussed the distribution of approximately half of a pound of  
13 methamphetamine.

14       122. On March 19, 2017, defendants ASCENCIO and MEJIA, using  
15 coded language in a telephone conversation, discussed the quality of  
16 two pounds of marijuana in defendant ASCENCIO's possession.

17       123. On March 21, 2017, defendants J. GARCIA and GOMEZ, using  
18 coded language in a telephone conversation, discussed defendant  
19 GOMEZ's collection of \$300 of extortionate taxes.

20       124. On March 22, 2017, defendant RODRIGUEZ, using coded  
21 language in a text message, provided defendant J. GARCIA with  
22 defendant LAREDO's prison address and MoneyGram information.

23       125. On March 22, 2017, defendant GOMEZ, using coded language in  
24 a telephone conversation, agreed to supply Co-conspirator 8 a  
25 controlled substance via a new potential route into a prison.

26       126. On March 22, 2017, defendant ASCENCIO, using coded language  
27 in a telephone conversation, told Hernandez that he was going to  
28 bring Hernandez one unit of methamphetamine.

1       127. On March 22, 2017, defendant ASCENCIO, using coded language  
2 in a telephone conversation, spoke with Hernandez, who asked  
3 defendant ASCENCIO to bring one unit of methamphetamine to him so  
4 that they could sell it.

5       128. On March 23, 2017, defendant ASCENCIO, using coded language  
6 in a telephone conversation, told defendant J. GARCIA that he found a  
7 source of supply for heroin.

8       129. On March 23, 2017, defendant J. GARCIA, using coded  
9 language in a telephone conversation, told defendant ASCENCIO that  
10 defendant J. GARCIA already had obtained heroin from another source.

11       130. On March 23, 2017, defendant ASCENCIO and defendant  
12 Hernandez, using coded language in a telephone conversation,  
13 discussed how defendant Hernandez's nephew accidentally threw out one  
14 unit of methamphetamine.

15       131. On March 24, 2017, defendant RODRIGUEZ, using coded  
16 language in a text message, instructed defendant J. GARCIA to collect  
17 extortionate taxes.

18       132. On March 24, 2017, defendant J. GARCIA and Roca, using  
19 coded language in a telephone conversation, discussed how Co-  
20 conspirator 4 had asked Roca to call defendant J. GARCIA to see  
21 whether he had any heroin available.

22       133. On March 24, 2017, defendant J. GARCIA, using coded  
23 language in a telephone conversation, told Roca that he had heroin  
24 available and that Co-conspirator 4 knew the price.

25       134. On March 24, 2017, defendant J. GARCIA and Roca, using  
26 coded language in a telephone conversation, discussed Co-conspirator  
27 4's request for one ounce of heroin.

28

1       135. On March 25, 2017, defendant GOMEZ, using coded language in  
2 a telephone conversation, agreed to supply Co-conspirator 8 a  
3 controlled substance via a new potential route into a prison.

4       136. On March 25, 2017, defendant GOMEZ, using coded language in  
5 a telephone conversation, told Banuelos that he needed to speak to  
6 Ruvalcaba to purchase one unit of a controlled substance.

7       137. On March 26, 2017, defendant GOMEZ, using coded language in  
8 a telephone conversation, asked Banuelos whether Ruvalcaba could sell  
9 him another, more expensive form of a controlled substance.

10       138. On March 27, 2017, defendants RODRIGUEZ and J. GARCIA,  
11 using coded language in a telephone conversation, discussed the  
12 collection of extortionate taxes for defendant LAREDO.

13       139. On March 27, 2017, defendant J. GARCIA and Roca, using  
14 coded language in a telephone conversation, discussed how Co-  
15 conspirator 4 needed another ounce of heroin from defendant J.  
16 GARCIA.

17       140. On March 27, 2017, defendant J. GARCIA, using coded  
18 language in a telephone conversation, told an unindicted co-  
19 conspirator that he could sell the unindicted co-conspirator a  
20 "piece" of high quality heroin for \$600.

21       141. On March 28, 2017, defendant J. GARCIA, using coded  
22 language in a telephone conversation, asked defendant ASCENCIO to  
23 stay overnight at a "casita" with a firearm.

24       142. On March 28, 2017, defendant J. GARCIA, using coded  
25 language in a telephone conversation, told defendant ASCENCIO that he  
26 would acquire a gun from defendant J. ROMERO to give to defendant  
27 ASCENCIO so that defendant ASCENCIO could protect a "casita"  
28 overnight.

1       143. On March 28, 2017, defendant J. GARCIA, using coded  
2 language in a telephone conversation, told Banuelos that he needed to  
3 purchase one ounce of heroin from Ruvalcaba and Banuelos, and  
4 Banuelos agreed to provide the ounce of heroin to defendant J.  
5 GARCIA.

6       144. On March 28, 2017, defendant ASCENCIO and Hernandez, using  
7 coded language in a telephone conversation, discussed Hernandez's  
8 drug source from Sinaloa, Mexico, who would sell Hernandez  
9 approximately 3.5 grams of heroin for \$70.

10       145. On March 29, 2017, defendant J. GARCIA, using coded  
11 language in a telephone conversation, told defendant ASCENCIO that he  
12 would arrive at the "casita" soon with other F13 Gang members to  
13 transport gambling equipment.

14       146. On March 29, 2017, defendants J. GARCIA and ASCENCIO, and  
15 others known and unknown to the Grand Jury, transported gambling  
16 machines from a "casita" controlled by the F13 Gang in F13 Gang  
17 territory.

18       147. On March 30, 2017, defendants LAREDO and J. GARCIA, using  
19 coded language in a telephone conversation, discussed the collection  
20 of extortionate taxes and the distribution of such taxes to defendant  
21 LAREDO and Co-conspirator 3.

22       148. On March 30, 2017, defendant LAREDO received \$400 in his  
23 prison account via MoneyGram from an unindicted co-conspirator.

24       149. On March 30, 2017, defendant BAROCIO, using coded language  
25 in a telephone conversation, agreed to sell defendant J. GARCIA one  
26 pound of methamphetamine.

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1       150. On March 30, 2017, defendant ASCENCIO, using coded language  
2 in a telephone conversation, asked defendant BAROCIO for an  
3 unspecified amount of cocaine.

4       151. On March 30, 2017, defendants J. GARCIA and A. GARCIA,  
5 using coded language in a telephone conversation, discussed  
6 extortionate taxes owed by an F13 Gang member.

7       152. On March 31, 2017, defendant BAROCIO, using coded language  
8 in a telephone conversation, agreed to sell defendant J. GARCIA four  
9 ounces of methamphetamine.

10       153. On March 31, 2017, defendant J. GARCIA, using coded  
11 language in a telephone conversation, told an unindicted co-  
12 conspirator that he would punish D.B., an F13 Gang member, for  
13 violating F13 Gang rules.

14       154. On March 31, 2017, defendant J. GARCIA, using coded  
15 language in a telephone conversation, instructed defendant J.  
16 GONZALEZ to assault D.B. and to "whoop his motherfuckin' ass."

17       155. On March 31, 2017, defendant J. GONZALEZ, using coded  
18 language in a telephone conversation, told defendant J. GARCIA that  
19 he knew where to find D.B. and that he would assault D.B.

20       156. On March 31, 2017, defendant J. GARCIA, using coded  
21 language in a telephone conversation, told defendant J. GONZALEZ to  
22 recruit other members of the F13 Gang and tell them that the  
23 leadership of the F13 Gang wanted D.B. to be assaulted.

24       157. On March 31, 2017, defendant J. GONZALEZ, using coded  
25 language in a telephone conversation, agreed with defendant J. GARCIA  
26 to assault D.B.

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1       158. On March 31, 2017, defendant J. GARCIA, using coded  
2 language in a telephone conversation, told defendant J. GONZALEZ to  
3 break D.B.'s legs.

4       159. On March 31, 2017, an F13 Gang member or associate,  
5 assaulted D.B., causing D.B. to sustain a bruised and swollen right  
6 eye, as well as lacerations about his right eye, on top of his head,  
7 on the right side of his face, on his abdomen, and on his upper right  
8 side.

9       160. On March 31, 2016, defendant J. GONZALEZ, using coded  
10 language in a telephone conversation, reported to defendant J. GARCIA  
11 that he found D.B. and that D.B. was in the hospital.

12       161. On March 31, 2017, defendant J. GARCIA, using coded  
13 language in a text message, asked Roca how much heroin she needed.

14       162. On April 2, 2017, defendant ASCENCIO, using coded language  
15 in a text message, told defendant J. GARCIA that defendant ASCENCIO  
16 needed to obtain a firearm.

17       163. On April 2, 2017, defendant BAROCIO, using coded language  
18 in a telephone conversation, agreed to sell defendant J. GARCIA four  
19 ounces of methamphetamine.

20       164. On April 3, 2017, defendant GOMEZ, using coded language in  
21 a telephone conversation, told a drug customer that he would sell  
22 heroin for \$800 per ounce and methamphetamine for \$500 per ounce.

23       165. On April 4, 2017, defendant J. GARCIA, using coded language  
24 in a telephone conversation, asked defendant RODRIGUEZ whether  
25 defendant RODRIGUEZ could smuggle a controlled substance into prison.

26       166. On April 4, 2017, defendant RODRIGUEZ, using coded language  
27 in a telephone conversation, told defendant J. GARCIA that defendant  
28 RODRIGUEZ could smuggle a controlled substance into prison.

1       167. On April 4, 2017, defendant J. GARCIA, using coded language  
2 in a telephone conversation, told defendant RODRIGUEZ that he could  
3 provide heroin and methamphetamine to defendant RODRIGUEZ, which  
4 subsequently could be distributed in prison.

5       168. On April 4, 2017, defendant J. GARCIA, using coded language  
6 in a telephone conversation, told defendant RODRIGUEZ that he had an  
7 ounce of heroin that he was going to sell to an unindicted co-  
8 conspirator at Folsom State Prison, in Folsom, California.

9       169. On April 4, 2017, defendant MEJIA, using coded language in  
10 a telephone conversation, told defendant J. GARCIA that he could sell  
11 him a firearm.

12       170. On April 5, 2017, defendant J. ROMERO sold approximately 46  
13 grams of methamphetamine to an individual who he believed was a  
14 methamphetamine customer, but who was, in fact, a confidential human  
15 source working with law enforcement ("CHS-3") for \$540.

16       171. On April 5, 2017, defendant J. GARCIA, using coded language  
17 in a telephone conversation, asked defendant BAROCIO for the price of  
18 a pound of methamphetamine and whether defendant J. GARCIA could  
19 purchase a pound of methamphetamine for \$2,300.

20       172. On April 5, 2017, defendant BAROCIO, using coded language  
21 in a telephone conversation, told defendant J. GARCIA that he could  
22 sell a pound of methamphetamine for \$2,400.

23       173. On April 5, 2017, defendant J. GARCIA, using coded language  
24 in a telephone conversation, told defendant BAROCIO that he wanted to  
25 purchase the methamphetamine immediately.

26       174. On April 5, 2017, defendants J. GARCIA and A. GARCIA, using  
27 coded language in a telephone conversation, discussed extortionate  
28 taxes owed by an F13 Gang member.

1       175. On April 6, 2017, defendants J. GARCIA and GOMEZ, using  
2 coded language in a telephone conversation, discussed defendant  
3 GOMEZ's collection of \$800 of extortionate taxes.

4       176. On April 6, 2017, defendant J. GARCIA and Marroquin, using  
5 coded language in a telephone conversation, discussed how Marroquin  
6 could sell defendant J. GARCIA two firearms.

7       177. On April 6, 2017, defendant J. GARCIA and Marroquin, using  
8 coded language in a telephone conversation, discussed the price  
9 defendant J. GARCIA would charge Marroquin for a pound of  
10 methamphetamine.

11       178. On April 6, 2017, defendant J. GARCIA and Marroquin, using  
12 coded language in a telephone conversation, discussed the comparative  
13 black market pricing of methamphetamine in different parts of the  
14 United States.

15       179. On April 9, 2017, defendant LAREDO, using coded language in  
16 a telephone conversation, discussed with an unindicted co-conspirator  
17 the smuggling of controlled substances into prison.

18       180. On April 11, 2017, defendant J. ROMERO sold approximately  
19 42 grams of methamphetamine and 17.24 grams of heroin to CHS-3 for  
20 \$1,300.

21       181. On April 26, 2017, defendant LAREDO received \$500 in his  
22 prison account via MoneyGram from an unindicted co-conspirator.

23       182. On April 27, 2017, defendant J. GARCIA, using coded  
24 language in a telephone conversation, told another F13 Gang member,  
25 Co-conspirator 10, that he could lend him a firearm, because members  
26 of another gang were near Co-conspirator 10's location.

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1       183. On April 28, 2017, defendant J. GARCIA and Co-conspirator  
2       4, using coded language in a telephone conversation, discussed the  
3       smuggling of controlled substances into Folsom State Prison.

4       184. On April 28, 2017, defendant J. GARCIA and an unindicted  
5       co-conspirator, using coded language in a telephone conversation,  
6       discussed holding an individual who owed a drug debt hostage, until  
7       he paid off his debt.

8       185. On April 28, 2017, defendant BAROCIO, using coded language  
9       in a telephone conversation, told an unindicted co-conspirator that  
10      defendant BAROCIO could broker a sale of ounce quantities of  
11      controlled substances.

12      186. On April 28, 2017, defendant BAROCIO, using coded language  
13      in a telephone conversation, told an unindicted co-conspirator that  
14      he could sell "eight balls" of cocaine to the unindicted co-  
15      conspirator's coworker.

16      187. On April 28, 2017, defendant MEJIA discharged a firearm and  
17      assaulted R.R., an F13 Gang member, in retaliation for violating gang  
18      rules.

19      188. On April 29, 2017, defendant J. GARCIA, using coded  
20      language in a telephone conversation, told Co-conspirator 10 that he  
21      would lend him a firearm to use to intimidate members of a rival  
22      gang.

23      189. On April 29, 2017, defendant J. GARCIA, using coded  
24      language in a telephone conversation, told an unindicted co-  
25      conspirator that R.R. deserved having been shot for violating F13  
26      Gang rules.

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190. On April 29, 2017, defendant MEJIA, using coded language in a telephone conversation, told defendant J. GARCIA that he was attempting to conceal his location following the shooting of R.R.

191. On April 29, 2017, defendant MEJIA, using coded language in a telephone conversation, told defendant J. GARCIA that he was carrying two firearms.

192. On April 29, 2017, defendant J. GARCIA, using coded language in a text message, told defendant MEJIA to hide to prevent being arrested by law enforcement.

193. On April 30, 2017, defendant J. GARCIA, using coded language in a telephone conversation, told defendant L. ROMERO that he had lent a firearm to Co-conspirator 10 for his protection, because members of another gang were near Co-conspirator 10's location.

194. On May 2, 2017, defendant GOMEZ, using coded language in a telephone conversation, agreed to assist an unindicted co-conspirator with collecting an extortionate payment and discussed a possible new source of supply of kilogram quantities of controlled substances.

195. On May 2, 2017, defendant BAROCIO and an unindicted co-conspirator, using coded language in a telephone conversation, discussed the pricing and distribution of a controlled substance.

196. On May 2, 2017, defendants J. GARCIA and PINEDA, using coded language in a telephone conversation, discussed the operation of a "casita" in F13 Gang territory.

197. On May 2, 2017, defendant MEJIA, using coded language, told CHS-1 that he had previously hit someone with a pistol and stolen \$200 from that person.

1       198. On May 5, 2017, defendant J. GARCIA and GOMEZ, using coded  
2 language in a telephone conversation, discussed defendant GOMEZ's  
3 collection of extortionate taxes.

4       199. On May 5, 2017, defendant L. ROMERO, using coded language  
5 in a telephone conversation, agreed to receive a firearm from  
6 defendant J. GARCIA, which he subsequently was going to provide to J.  
7 ROMERO.

8       200. On May 5, 2017, defendants J. GARCIA and PINEDA, using  
9 coded language in a telephone conversation, discussed the  
10 distribution of a controlled substance at a "casita" in F13 Gang  
11 territory.

12       201. On May 6, 2017, defendants L. ROMERO and J. GARCIA, using  
13 coded language in a telephone conversation, discussed the collection  
14 of \$100 of extortionate taxes.

15       202. On May 6, 2017, defendants J. GARCIA and PINEDA, using  
16 coded language in a telephone conversation, discussed the operation  
17 of a "casita" in F13 Gang territory.

18       203. On May 7, 2017, defendants J. GARCIA and PINEDA, using  
19 coded language in a telephone conversation, discussed their use of  
20 illegal gambling machines at a "casita" in F13 Gang territory.

21       204. On May 8, 2017, defendant BAROCIO, using coded language in  
22 a telephone conversation, offered to sell a unit of a controlled  
23 substance to an unindicted co-conspirator.

24       205. On May 8, 2017, defendants J. GARCIA and PINEDA, using  
25 coded language in a telephone conversation, discussed their use of  
26 illegal gambling machines at a "casita" in F13 Gang territory.

27       206. On May 10, 2017, defendant J. GARCIA, using coded language  
28 in a telephone conversation, asked defendant L. ROMERO whether he

1 obtained packaging materials for use in selling controlled  
2 substances.

3 207. On May 10, 2017, defendant L. ROMERO, using coded language  
4 in a telephone conversation, told defendant J. GARCIA that he had a  
5 scale available to weigh controlled substances.

6 208. On May 10, 2017, defendant J. GARCIA and Cervantes, using  
7 coded language in a telephone conversation, discussed the quality of  
8 \$250 worth of heroin that Cervantes had provided to defendant J.  
9 GARCIA.

10 209. On May 12, 2017, defendant GOMEZ, using coded language in a  
11 telephone conversation, arranged to purchase a controlled substance  
12 from Ruvalcaba.

13 210. On May 12, 2017, defendant BAROCIO, using coded language in  
14 a telephone conversation, told defendant J. GARCIA that he would  
15 distribute cocaine.

16 211. On May 12, 2017, defendant MEJIA, using coded language in a  
17 text message, told defendant J. GARCIA that he could provide .45  
18 caliber bullets to defendant L. ROMERO.

19 212. On May 12, 2017, defendant MEJIA possessed a Llama MAX-I  
20 model, .45 caliber semi-automatic pistol, bearing serial number  
21 71040403402, loaded with seven rounds of .45 caliber ammunition in  
22 F13 Gang territory.

23 213. On May 13, 2017, defendant J. ROMERO possessed a Taurus  
24 model PT 140 G2, .40 Smith & Wesson caliber pistol, bearing serial  
25 number SIP15252, loaded with ten rounds of .40 Smith & Wesson caliber  
26 ammunition, in F13 Gang territory.

27 214. On May 13, 2017, defendant J. GARCIA, using coded language  
28 in a telephone conversation, told defendant RODRIGUEZ that law

1 enforcement had executed a search warrant on the "casita" located in  
2 F13 Gang territory at X24 East Florence Avenue in Los Angeles,  
3 California.

4 215. On May 13, 2017, defendant GOMEZ, using coded language in a  
5 telephone conversation, discussed smuggling a controlled substance  
6 into a prison with an unindicted co-conspirator.

7 216. On May 13, 2017, defendants J. GARCIA and PINEDA, using  
8 coded language in a telephone conversation, discussed the execution  
9 of a search warrant at a "casita" in F13 Gang territory, and the  
10 resulting seizure of illegal gambling machines.

11 217. On May 13, 2017, defendant J. GARCIA and Cardenas, using  
12 coded language in a text message conversation, discussed whether  
13 defendant J. GARCIA could provide Cardenas with one or two ounces of  
14 a controlled substance for redistribution to a customer.

15 218. On May 15, 2017, defendant J. ROMERO, using coded language  
16 in a telephone conversation, told defendant J. GARCIA that, on May  
17 13, 2017, during the execution of a search warrant, defendant J.  
18 ROMERO had placed his firearm in the freezer of the "casita" located  
19 at X24 East Florence Avenue in F13 Gang territory in Los Angeles,  
20 California.

21 219. On May 16, 2017, defendant ASCENCIO sold approximately  
22 1.962 grams of methamphetamine to CHS-3 for \$100.

23 220. On May 16, 2017, defendant ASCENCIO, using coded language  
24 during an in-person conversation, told CHS-3 that defendant ASCENCIO  
25 recently had sold a firearm.

26 221. On May 18, 2017, defendant ASCENCIO sold approximately 110  
27 grams of methamphetamine to CHS-3 for \$1,250.

1       222. On May 18, 2017, defendant ASCENCIO, using coded language  
2 during an in-person conversation, told CHS-3 that he transports  
3 firearms from Las Vegas, Nevada, to Los Angeles, California.

4       223. On May 18, 2017, defendant ASCENCIO, using coded language  
5 during an in-person conversation, told CHS-3 that he could sell CHS-3  
6 cocaine, but that it is expensive.

7       224. On May 18, 2017, defendant J. ROMERO, using coded language  
8 in a telephone conversation, agreed to assault and rob an F13 Gang  
9 member who took property belonging to the F13 Gang.

10       225. On May 18, 2017, defendant PINEDA, using coded language in  
11 a telephone conversation, told defendant J. GARCIA that she had three  
12 units of a controlled substance available to sell to defendant  
13 ASCENCIO.

14       226. On May 22, 2017, defendant J. GARCIA, using coded language  
15 in a text message, told defendant RODRIGUEZ that he had collected  
16 extortionate taxes for Co-conspirators 1 and 2.

17       227. On May 22, 2017, defendant J. ROMERO, using coded language  
18 in a telephone conversation, informed defendant J. GARCIA about a  
19 member or associate of the F13 Gang who had collected money from a  
20 "casita" on behalf of the F13 Gang.

21       228. On May 23, 2017, defendant J. GARCIA and Cervantes, using  
22 coded language in a text message conversation, discussed how  
23 Cervantes had half of an ounce of heroin, but that he would have a  
24 full ounce later in the week.

25       229. On May 23, 2017, defendants ASCENCIO and BAROCIO, using  
26 coded language in a telephone conversation, discussed prices for  
27 "china white" and "black" heroin, after which defendant BAROCIO

1 agreed to sell defendant ASCENCIO two units of "black" heroin for  
2 \$700 per ounce.

3 230. On May 25, 2017, defendant ASCENCIO sold approximately 52.1  
4 grams of heroin to CHS-3 for \$1,700.

5 231. On June 10, 2017, defendants LAREDO and J. GARCIA, using  
6 coded language in a telephone conversation, discussed the possession  
7 and distribution of pound quantities of a controlled substance.

8 232. On June 12, 2017, defendant BAROCIO, using coded language  
9 in a telephone conversation, discussed with an unindicted co-  
10 conspirator the sale of a firearm.

11 233. On June 13, 2017, defendant J. ROMERO and an unindicted co-  
12 conspirator, using coded language in a telephone conversation,  
13 discussed the potential murder and assault of an individual who owed  
14 a debt to them.

15 234. On June 17, 2017, defendant BAROCIO, using coded language  
16 in a telephone conversation, discussed with an unindicted co-  
17 conspirator the sale of a firearm.

18 235. On June 21, 2017, defendant MADERA sold approximately 54  
19 grams of methamphetamine to CHS-1 for \$500.

20 236. On June 22, 2017, defendant L. ROMERO, using coded language  
21 in a telephone conversation, offered to purchase a controlled  
22 substance.

23 237. On June 23, 2017, defendant J. ROMERO, using coded language  
24 in a telephone conversation, asked defendant L. ROMERO for an ounce  
25 of a controlled substance so that it could be sold at a "casita."

26 238. On June 23, 2017, defendant L. ROMERO, using coded language  
27 in a telephone conversation, told defendant J. ROMERO that he could  
28 provide defendant J. ROMERO with an ounce of a controlled substance.

1           239. On September 17, 2017, defendant J. GARCIA possessed  
2 approximately 24.8 grams of methamphetamine; a Taurus TCP PT738 model  
3 .380 caliber pistol, bearing serial number 87845C; and six rounds of  
4 .380 caliber ammunition.

5           240. On November 8, 2017, defendant J. ROMERO possessed  
6 approximately 448.7 grams of methamphetamine; a Davis Industries  
7 model P-380, .380 caliber semiautomatic pistol, bearing serial number  
8 AP093790; and a Norinco semiautomatic rifle, model MAK-90, 7.62  
9 caliber, bearing serial number 22779.

10          241. On November 17, 2017, defendants LAREDO and RODRIGUEZ,  
11 using coded language in a telephone conversation, discussed the  
12 collection of extortionate taxes and the distribution of 40% of such  
13 proceeds to defendant LAREDO, Co-conspirator 1, Co-conspirator 2, and  
14 Co-conspirator 3.

15          242. On November 23, 2017, defendant LAREDO, using coded  
16 language in a telephone conversation, told defendant RODRIGUEZ that  
17 defendant J. GARCIA must provide 40% of the money that he earns as  
18 part of his F13 Gang activity to defendant LAREDO, Co-conspirator 1,  
19 Co-conspirator 2, and Co-conspirator 3.

20          243. On December 12, 2017, an unindicted co-conspirator, at the  
21 direction of defendant MONTANEZ, collected \$400 in extortionate fines  
22 from a confidential human source working with law enforcement ("CHS-  
23 7") for violating F13 Gang rules.

24          244. On December 12, 2017, defendant MONTANEZ collected \$800 in  
25 extortionate fines from CHS-7 for violating F13 Gang rules.

26          245. On December 13, 2017, defendant MONTANEZ, using coded  
27 language in a telephone conversation, told CHS-7 to only give an  
28 extortionate fine payment to defendant MONTANEZ.

246. On December 13, 2017, defendant MONTANEZ collected \$2,500 in extortionate fines from CHS-7 for violating F13 Gang rules.

247. On December 13, 2017, defendant MONTANEZ, using coded language during an in-person conversation, told CHS-7 that he owed an additional \$800 of extortionate fines for violating F13 Gang rules.

248. On December 18, 2017, defendant SILLAS, using coded language in a telephone conversation, told CHS-7 that he was going to sell CHS-7 a firearm for \$800.

249. On December 18, 2017, defendant SILLAS and an unindicted co-conspirator sold CHS-7 a custom-made .223 caliber assault style long rifle with no serial number, two magazines, and 15 rounds of .223 caliber ammunition.

250. On January 11, 2018, defendant MONTANEZ collected a \$1,000 extortionate fine from CHS-1 for violating F13 Gang rules.

251. On January 11, 2018, defendant MONTANEZ, using coded language, told CHS-1 that defendant MONTANEZ previously had "beat up" a person, and that CHS-1 should "fuck [the person's] ass up" the next time that he sees that person.

252. On January 16, 2018, defendant SILLAS, using coded language in a telephone conversation, discussed arranging the sale of approximately four ounces of methamphetamine with CHS-7.

253. On January 17, 2018, defendant SILLAS, using coded language in a telephone conversation, told CHS-7 that he would obtain the phone number for a source of methamphetamine who could supply CHS-7 with methamphetamine.

254. On January 17, 2018, defendant SILLAS, using coded language in a telephone conversation, told CHS-7 that CHS-7 owed defendant

1 MONTANEZ \$1,200 in extortionate fines and that defendants SILLAS and  
2 L. ROMERO would pick up this payment from CHS-7.

3 255. On January 17, 2018, defendant SILLAS, using coded language  
4 in a telephone conversation, told CHS-7 that defendant L. ROMERO was  
5 planning on assaulting CHS-7 as soon as CHS-7 leaves CHS-7's home.

6 256. On January 17, 2018, defendant L. ROMERO, using coded  
7 language in a telephone conversation, told CHS-7 that CHS-7 must call  
8 defendant MONTANEZ to discuss the extortionate payments that CHS-7  
9 owed defendant MONTANEZ.

10 257. On January 17, 2018, defendant MONTANEZ, using coded  
11 language in a telephone conversation, told CHS-7 that defendant  
12 MONTANEZ was currently the shot-caller of the F13 Gang.

13 258. On January 17, 2018, defendant MONTANEZ, using coded  
14 language in a telephone conversation, told CHS-7 that CHS-7 could not  
15 sell controlled substances in F13 Gang territory, or elsewhere,  
16 because CHS-7 violated F13 Gang rules.

17 259. On January 17, 2018, defendant MONTANEZ, using coded  
18 language in a telephone conversation, told CHS-7 that CHS-7 could  
19 continue to arrange for the sale of controlled substances in F13 Gang  
20 territory, or elsewhere, as long as the controlled substance were  
21 purchased from defendant MONTANEZ.

22 260. On January 17, 2018, defendant MONTANEZ, using coded  
23 language in a telephone conversation, told CHS-7 that if CHS-7  
24 continued to sell controlled substances in F13 Gang territory, or  
25 elsewhere, that CHS-7 had not purchased from defendant MONTANEZ,  
26 defendant MONTANEZ would send people to CHS-7's home to assault  
27 and/or murder CHS-7.

1       261. On January 17, 2018, defendant MONTANEZ, using coded  
2 language in a telephone conversation, told CHS-7 that CHS-7 owed  
3 defendant MONTANEZ \$1,200 in extortionate fines.

4       262. On January 18, 2018, defendant SILLAS, using coded language  
5 in a telephone conversation, provided CHS-7 instructions as to where  
6 to meet Alvarez to purchase methamphetamine, which CHS-7 did,  
7 purchasing approximately 112 grams of methamphetamine from Alvarez in  
8 exchange for \$600.

9       263. On January 18, 2018, defendant SILLAS was paid \$200 by CHS-  
10 7 in exchange for arranging for CHS-7's purchase of approximately 112  
11 grams of methamphetamine from Alvarez to CHS-7.

12       264. On January 18, 2018, defendant MONTANEZ, using coded  
13 language in a telephone conversation, told CHS-7 that defendant  
14 MONTANEZ needed to collect \$400 in extortionate fines from CHS-7.

15       265. On January 18, 2018, defendant SILLAS, using coded language  
16 in a telephone conversation, collected \$400 in extortionate fines  
17 from CHS-7.

18       266. On January 18, 2018, defendant SILLAS, using coded language  
19 in a telephone conversation, told CHS-7 that defendant SILLAS had  
20 forwarded the \$400 in extortionate fines paid by CHS-7 to defendant  
21 MONTANEZ.

22       267. On January 19, 2018, defendant L. ROMERO possessed a  
23 Springfield XD-9 model, 9mm semi-automatic pistol, bearing serial  
24 number XD822061, loaded with 11 rounds of 9mm ammunition.

25       268. On January 25, 2018, defendant MONTANEZ, using coded  
26 language in a telephone conversation, told CHS-7 to bring him \$400 in  
27 extortionate fines.

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1       269. On January 25, 2018, defendant MONTANEZ sent \$200 of  
2 extortionate tax or fine payments to defendant LAREDO via MoneyGram.

3       270. On February 18, 2018, defendant MONTANEZ sent \$100 of  
4 extortionate tax or fine payments to defendant LAREDO via MoneyGram.

5       271. On March 21, 2018, defendant MONTANEZ sent \$300 of  
6 extortionate tax or fine payments to defendant LAREDO via MoneyGram.

7       272. On March 25, 2018, defendant RODRIGUEZ, using coded  
8 language in a telephone conversation, instructed CHS-7 that defendant  
9 LAREDO wanted the F13 Gang to increase its territory and control in  
10 Los Angeles, California.

11       273. On May 12, 2018, defendant RODRIGUEZ, using coded language  
12 in a telephone conversation, directed CHS-7 to meet Regalado in the  
13 area of 79th Street and Western Avenue in Los Angeles, California, to  
14 purchase approximately one pound of methamphetamine, which CHS-7 did,  
15 purchasing approximately 442.7 grams of methamphetamine from Regalado  
16 for \$1,650.

17       274. On May 14, 2018, defendant RODRIGUEZ, using coded language  
18 in a voicemail, directed CHS-7 to obtain methamphetamine from  
19 Regalado, which, on May 15, 2018, CHS-7 did, receiving approximately  
20 442.3 grams of methamphetamine from Regalado.

21       275. On May 15, 2018, defendant RODRIGUEZ, using coded language  
22 in a telephone conversation, told CHS-7 that either defendant  
23 RODRIGUEZ or Co-conspirator 9 would ensure that defendant LAREDO, Co-  
24 conspirator 1, Co-conspirator 2, and Co-conspirator 3, received their  
25 share of money earned from the sale of the methamphetamine that CHS-7  
26 had obtained from Regalado that day.

27       D. SPECIAL SENTENCING ALLEGATIONS

28       The Grand Jury further alleges that:

1       1. Beginning on a date unknown to the Grand Jury, and  
2 continuing to on or about December 20, 2018, in Los Angeles County,  
3 within the Central District of California, and elsewhere, defendants  
4 LAREDO, RODRIGUEZ, MONTANEZ, J. GARCIA, C. GONZALEZ, GOMEZ, ASCENCIO,  
5 J. ROMERO, L. ROMERO, BAROCIO, MADERA, MEJIA, SILLAS, PINEDA, and A.  
6 GARCIA, and others known and unknown to the Grand Jury, conspired and  
7 agreed with each other to knowingly and intentionally commit the  
8 following offenses:

9               (a) To distribute and to possess with intent to distribute  
10 at least 500 grams of a mixture and substance containing a detectable  
11 amount of methamphetamine, and at least 50 grams of methamphetamine,  
12 a Schedule II controlled substance, in violation of Title 21, United  
13 States Code, Sections 841(a)(1), (b)(1)(A)(viii).

14               (b) To distribute and to possess with intent to distribute  
15 at least one kilogram of a mixture and substance containing a  
16 detectable amount of heroin, a Schedule I narcotic drug controlled  
17 substance, in violation of Title 21, United States Code, Sections  
18 841(a)(1), (b)(1)(A)(i).

1 COUNT TWO

2 [18 U.S.C. § 1959(a)(6)]

3 1. Paragraphs 1 through 11 of the Introductory Allegations of  
4 this Indictment are re-alleged and incorporated by reference as if  
5 fully set forth herein.

6 2. At all times relevant to this Indictment, the F13 Gang,  
7 including its leaders, members, and associates, constituted an  
8 "enterprise," as defined by Title 18, United States Code, Section  
9 1959(b)(2), that is, a group of individuals associated in fact,  
10 although not a legal entity, which was engaged in, and the activities  
11 of which affected, interstate and foreign commerce. The enterprise  
12 constituted an ongoing organization whose members functioned as a  
13 continuing unit for a common purpose of achieving the objectives of  
14 the enterprise.

15 3. At all times relevant to this Indictment, the F13 Gang,  
16 through its leaders, members, and associates, engaged in racketeering  
17 activity, as defined in Title 18, United States Code, Sections  
18 1959(b)(1) and 1961(1), consisting of multiple acts involving:

19 (1) murder, in violation of California Penal Code Sections 21a,  
20 31, 182, 187, 189, 190, and 664;

21 (2) extortion, in violation of California Penal Code Sections  
22 21a, 31, 182, 518, 519, 520, 664;

23 multiple acts indictable under:

24 (1) Title 18, United States Code, Section 1955 (relating to  
25 prohibition on illegal gambling businesses);

26 (2) Title 18, United States Code, Section 1956 (relating to the  
27 laundering of monetary instruments);

28 and multiple offenses involving drug trafficking in violation of

1 Title 21, United States Code, Sections 841(a)(1), 843(b), and 846.

2 4. On or about March 31, 2017, in Los Angeles County, within  
3 the Central District of California, for the purpose of maintaining  
4 and increasing position in the F13 Gang, an enterprise engaged in  
5 racketeering activity, defendants J. GARCIA and J. GONZALEZ conspired  
6 to commit an assault of D.B. that would result in serious bodily  
7 injury to D.B., in violation of California Penal Code Sections 182  
8 and 245.

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1 COUNT THREE

2 [18 U.S.C. § 1959(a)(3)]

3 1. Paragraphs 1 through 3 of Count Two of this Indictment are  
4 re-alleged and incorporated by reference as if fully set forth  
5 herein.

6 2. On or about April 28, 2017, in Los Angeles County, within  
7 the Central District of California, for the purpose of maintaining  
8 and increasing position in the F13 Gang, an enterprise engaged in  
9 racketeering activity, defendant MEJIA assaulted with a dangerous  
10 weapon R.R., in violation of California Penal Code Section 245(a)(2).

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1 COUNT FOUR

2 [21 U.S.C. § 846]

3 1. Paragraphs 1 through 11 of the Introductory Allegations are  
4 re-alleged and incorporated by reference as if fully set forth  
5 herein.

6 A. OBJECTS OF THE CONSPIRACY

7 2. Beginning on a date unknown, and continuing to on or about  
8 December 20, 2018, in Los Angeles County, within the Central District  
9 of California, and elsewhere, defendants LAREDO, RODRIGUEZ, MONTANEZ,  
10 J. GARCIA, C. GONZALEZ, GOMEZ, ASCENCIO, J. ROMERO, L. ROMERO,  
11 BAROCIO, MADERA, MEJIA, SILLAS, PINEDA, REGALADO, ALVAREZ, RUVALCABA,  
12 BANUELOS, CARBAJAL, ROCA, CARDENAS, HERNANDEZ, CERVANTES, and  
13 MARROQUIN, Co-Conspirator 1, Co-Conspirator 2, Co-Conspirator 3, Co-  
14 Conspirator 4, Co-Conspirator 5, Co-Conspirator 6, Co-Conspirator 7,  
15 Co-Conspirator 8, Co-Conspirator 9, and others known and unknown to  
16 the Grand Jury, conspired and agreed with each other to knowingly and  
17 intentionally commit the following offenses:

18 (a) To distribute, and to possess with intent to  
19 distribute, at least 500 grams of a mixture and substance containing  
20 a detectable amount of methamphetamine, and at least 50 grams of  
21 methamphetamine, a Schedule II controlled substance, in violation of  
22 Title 21, United States Code, Sections 841(a)(1), (b)(1)(A)(viii);

23 (b) To distribute, and to possess with intent to  
24 distribute, at least one kilogram of a mixture and substance  
25 containing a detectable amount of heroin, a Schedule I narcotic drug  
26 controlled substance, in violation of Title 21, United States Code,  
27 Sections 841(a)(1), (b)(1)(A)(i);

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(c) To distribute, and to possess with intent to distribute, cocaine, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C); and

(d) To distribute, and to possess with intent to distribute, marijuana, a Schedule I narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE ACCOMPLISHED

3. The Grand Jury re-alleges and incorporates by reference as if fully set forth herein paragraphs 1 through 10 of Section B of Count One of this Indictment.

4. Defendants MONTANEZ, J. GARCIA, C. GONZALEZ, GOMEZ, ASCENCIO, J. ROMERO, L. ROMERO, BAROCIO, MADERA, SILLAS, PINEDA, REGALADO, ALVAREZ, RUVALCABA, BANUELOS, CARBAJAL, ROCA, CARDENAS, HERNANDEZ, CERVANTES, and MARROQUIN, and others known and unknown to the Grand Jury, would provide, and assist F13 Gang members and associates in obtaining, controlled substances for further distribution.

### C. OVERT ACTS

5. In furtherance of the conspiracy, and to accomplish the objects of the conspiracy, on or about the following dates, defendants MONTANEZ, J. GARCIA, C. GONZALEZ, GOMEZ, ASCENCIO, J. ROMERO, L. ROMERO, BAROCIO, MADERA, SILLAS, PINEDA, REGALADO, ALVAREZ, RUVALCABA, BANUELOS, CARBAJAL, ROCA, CARDENAS, HERNANDEZ, CERVANTES, and MARROQUIN, and others known and unknown to the Grand Jury, committed various overt acts, within the Central District of

1 California, and elsewhere, including, but not limited to, overt acts  
2 1, 3-4, 5-24, 27-28, 30-34, 36-71, 73, 75-84, 93-97, 99-101, 103-144,  
3 147-152, 161-186, 188, 194-196, 198-202, 204, 206-219, 221-223, 225-  
4 231, 235-242, 252-253, 258-260, 262-263, 267, and 269-275, as set  
5 forth in Count One, which are hereby re-alleged and incorporated by  
6 reference as if fully set forth herein.

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1 COUNT FIVE

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

3 On or about May 11, 2016, in Los Angeles County, within the  
4 Central District of California, defendant CHRISTOPHER GONZALEZ, also  
5 known as ("aka") "Solo," aka "Soliman," aka "Lil Psycho," aka "Soli,"  
6 knowingly and intentionally distributed at least 50 grams, that is,  
7 approximately 52 grams, of methamphetamine, a Schedule II controlled  
8 substance.

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1 COUNT SIX

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

3 On or about May 23, 2016, in Los Angeles County, within the  
4 Central District of California, defendant CHRISTOPHER GONZALEZ, also  
5 known as ("aka") "Solo," aka "Soliman," aka "Lil Psycho," aka "Soli,"  
6 knowingly and intentionally distributed at least 50 grams, that is,  
7 approximately 436 grams, of methamphetamine, a Schedule II controlled  
8 substance.

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1 COUNT SEVEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(B)(i); 18 U.S.C. § 2(a)]

3 On or about February 6, 2017, in Los Angeles County, within the  
4 Central District of California, defendants FRANK GOMEZ, also known as  
5 ("aka") "Crazy Boy," aka "CB," EULOGIO RUVALCABA, aka "Lou," and  
6 JENNIFER BANUELOS, aka "Jenny," each aiding and abetting the others,  
7 knowingly and intentionally distributed at least 100 grams, that is,  
8 approximately 100.7 grams, of a mixture and substance containing a  
9 detectable amount of heroin, a Schedule I narcotic drug controlled  
10 substance.

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1 COUNT EIGHT

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(B)(i)]

3 On or about February 6, 2017, in Los Angeles County, within the  
4 Central District of California, defendant JORGE GARCIA, also known as  
5 ("aka") "Lil Blazer," aka "Lil B," aka "LB," aka "Little Blaze," aka  
6 "Mona," aka "Gloria's Little Sister," knowingly and intentionally  
7 possessed with intent to distribute at least 100 grams, that is,  
8 approximately 100.7 grams, of a mixture and substance containing a  
9 detectable amount of heroin, a Schedule I narcotic drug controlled  
10 substance.

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1 COUNT NINE

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

3 On or about April 5, 2017, in Los Angeles County, within the  
4 Central District of California, defendant JESUS ROMERO, also known as  
5 "Spanky," knowingly and intentionally distributed at least five  
6 grams, that is, approximately 46 grams, of methamphetamine, a  
7 Schedule II controlled substance.

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1 COUNT TEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

3 On or about April 11, 2017, in Los Angeles County, within the  
4 Central District of California, defendant JESUS ROMERO, also known as  
5 "Spanky," knowingly and intentionally distributed at least five  
6 grams, that is, approximately 42 grams, of methamphetamine, a  
7 Schedule II controlled substance.

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1 COUNT ELEVEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

3 On or about April 11, 2017, in Los Angeles County, within the  
4 Central District of California, defendant JESUS ROMERO, also known as  
5 "Spanky," knowingly and intentionally distributed heroin, a Schedule  
6 I narcotic drug controlled substance.

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1 COUNT TWELVE

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

3 On or about May 16, 2017, in Los Angeles County, within the  
4 Central District of California, defendant RENE MOISES ASCENCIO, also  
5 known as "Player," knowingly and intentionally distributed  
6 methamphetamine, a Schedule II controlled substance.

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1 COUNT THIRTEEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

3 On or about May 18, 2017, in Los Angeles County, within the  
4 Central District of California, defendant RENE MOISES ASCENCIO, also  
5 known as "Player," knowingly and intentionally distributed at least  
6 50 grams, that is, approximately 110 grams, of methamphetamine, a  
7 Schedule II controlled substance.

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1 COUNT FOURTEEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

3 On or about May 25, 2017, in Los Angeles County, within the  
4 Central District of California, defendant RENE MOISES ASCENCIO, also  
5 known as "Player," knowingly and intentionally distributed heroin, a  
6 Schedule I narcotic drug controlled substance.

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1 COUNT FIFTEEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

3 On or about June 21, 2017, in Los Angeles County, within the  
4 Central District of California, defendant EDUARDO MADERA, also known  
5 as "Huero," knowingly and intentionally distributed at least 50  
6 grams, that is, approximately 54 grams, of methamphetamine, a  
7 Schedule II controlled substance.

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1 COUNT SIXTEEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(a)]

3 On or about January 18, 2018, in Los Angeles County, within the  
4 Central District of California, defendants VICTOR SILLAS, also known  
5 as ("aka") "Big Show," and JOSE ALVAREZ, aka "Vecino," each aiding  
6 and abetting the other, knowingly and intentionally distributed at  
7 least 50 grams, that is, approximately 112 grams, of methamphetamine,  
8 a Schedule II controlled substance.

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1 COUNT SEVENTEEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(a)]

3 On or about May 12, 2018, in Los Angeles County, within the  
4 Central District of California, defendants FRANCISCO RODRIGUEZ, also  
5 known as ("aka") "Dodger," aka "D," aka "Son," and GUADALUPE  
6 REGALADO, aka "Lupillo," and others known and unknown to the Grand  
7 Jury, each aiding and abetting the other, knowingly and intentionally  
8 distributed at least 50 grams, that is, approximately 442.7 grams, of  
9 methamphetamine, a Schedule II controlled substance.

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1 COUNT EIGHTEEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(a)]

3 On or about May 15, 2018, in Los Angeles County, within the  
4 Central District of California, defendants FRANCISCO RODRIGUEZ, also  
5 known as ("aka") "Dodger," aka "D," aka "Son," and GUADALUPE  
6 REGALADO, aka "Lupillo," and others known and unknown to the Grand  
7 Jury, each aiding and abetting the other, knowingly and intentionally  
8 distributed at least 50 grams, that is, approximately 442.3 grams, of  
9 methamphetamine, a Schedule II controlled substance.

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1 COUNT NINETEEN

2 [21 U.S.C. § 843(b)]

3 On or about March 28, 2017, in Los Angeles County, within the  
4 Central District of California, defendant VICTOR NOE HERNANDEZ, also  
5 known as ("aka") "Sneaks," aka "Pelon," knowingly and intentionally  
6 used a communication facility, that is, a telephone, in committing  
7 and in causing and facilitating the commission of a felony drug  
8 offense, namely, a violation of Title 21, United States Code, Section  
9 841(a)(1), possession with intent to distribute heroin.

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1 COUNT TWENTY

2 [21 U.S.C. § 843(b)]

3 On or about April 6, 2017, in Los Angeles County, within the  
4 Central District of California, and elsewhere, defendant CARLOS  
5 MARROQUIN, also known as ("aka") "Bullet," knowingly and  
6 intentionally used a communication facility, that is, a telephone, in  
7 committing and in causing and facilitating the commission of a felony  
8 drug offense, namely, a violation of Title 21, United States Code,  
9 Section 841(a)(1), possession with intent to distribute  
10 methamphetamine.

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1 COUNT TWENTY-ONE

2 [21 U.S.C. § 843(b)]

3 On or about May 13, 2017, in Los Angeles County, within the  
4 Central District of California, defendant IAN CARDENAS, also known as  
5 ("aka") "Samuel Camacho," aka "Fats," knowingly and intentionally  
6 used a communication facility, that is, a telephone, in committing  
7 and in causing and facilitating the commission of a felony drug  
8 offense, namely, a violation of Title 21, United States Code, Section  
9 841(a)(1), possession with intent to distribute methamphetamine.

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1 COUNT TWENTY-TWO

2 [21 U.S.C. § 843(b)]

3 On or about May 23, 2017, in Los Angeles County, within the  
4 Central District of California, defendant GONZALO CERVANTES, also  
5 known as "Gonzo," knowingly and intentionally used a communication  
6 facility, that is, a telephone, in committing and in causing and  
7 facilitating the commission of a felony drug offense, namely, a  
8 violation of Title 21, United States Code, Section 841(a)(1),  
9 possession with intent to distribute heroin.

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1 COUNT TWENTY-THREE

2 [18 U.S.C. §§ 924(c)(1)(A)(ii), (iii)]

3 On or about April 28, 2017, in Los Angeles County, within the  
4 Central District of California, defendant SAMUEL FLORES MEJIA, also  
5 known as "Menace," knowingly used and carried a firearm during and in  
6 relation to a crime of violence, namely, violent crime in aid of  
7 racketeering, in violation of Title 18, United States Code, Section  
8 1959(a)(3), as charged in Count Three of this Indictment, and, in  
9 doing so, brandished and discharged the firearm.

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1 COUNT TWENTY-FOUR

2 [18 U.S.C. § 924(c)(1)(A)(i)]

3 On or about September 17, 2017, in Los Angeles County, within  
4 the Central District of California, defendant JORGE GARCIA, also  
5 known as ("aka") "Lil Blazer," aka "Lil B," aka "LB," aka "Little  
6 Blaze," aka "Mona," knowingly carried a firearm, namely, a Taurus TCP  
7 PT738 model .380 caliber pistol, bearing serial number 87845C, during  
8 and in relation to, and possessed that firearm in furtherance of, a  
9 drug trafficking crime, namely, conspiracy to distribute and to  
10 possess with the intent to distribute methamphetamine, in violation  
11 of Title 21, United States Code, Section 846, as charged in Count  
12 Four of this Indictment.

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1 COUNT TWENTY-FIVE

2 [18 U.S.C. § 922(g)(1)]

3 On or about May 13, 2017, in Los Angeles County, within the  
4 Central District of California, defendant JESUS ROMERO, also known as  
5 "Spanky" ("J. ROMERO"), knowingly possessed the following firearm and  
6 ammunition, each in and affecting interstate and foreign commerce:

7 1. a Taurus model PT 140 G2, .40 Smith & Wesson caliber  
8 pistol, bearing serial number SIP15252;

9 2. nine rounds of .40 Smith & Wesson caliber ammunition with  
10 headstamp "SIG"; and

11 3. one round of .40 Smith & Wesson caliber ammunition with  
12 headstamp "Tulammo."

13 Such possession occurred after defendant J. ROMERO had been  
14 convicted of at least one of the following felony crimes, each  
15 punishable by a term of imprisonment exceeding one year:

16 1. Carrying a Concealed Firearm, in violation of California  
17 Penal Code Section 12025(a)(2), in the Superior Court for the State  
18 of California, County of Los Angeles, case number VA058443, on or  
19 about April 6, 2000;

20 2. Accessory After the Fact, in violation of California Penal  
21 Code Section 32, in the Superior Court for the State of California,  
22 County of Los Angeles, case number BA350531, on or about July 7,  
23 2009;

24 3. Possession of a Controlled Substance, in violation of  
25 California Health & Safety Code Section 11377(a), in the Superior  
26 Court for the State of California, County of Los Angeles, case number  
27 VA115497, on or about June 28, 2010;

1       4.    Possession of a Controlled Substance, in violation of  
2 California Health & Safety Code Section 11377(a), in the Superior  
3 Court for the State of California, County of Los Angeles, case number  
4 BA414754, on or about August 16, 2013;

5       5.    Possession of Ammunition, in violation of California Penal  
6 Code Section 30305(a)(1), in the Superior Court for the State of  
7 California, County of Los Angeles, case number BA414754, on or about  
8 August 16, 2013;

9       6.    Theft, in violation of California Penal Code Section  
10 484e(d), in the Superior Court for the State of California, County of  
11 Los Angeles, case number VA132230, on or about November 13, 2013.

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1 COUNT TWENTY-SIX

2 [18 U.S.C. § 922(g)(1)]

3 On or about September 17, 2017, in Los Angeles County, within  
4 the Central District of California, defendant JORGE GARCIA, also  
5 known as ("aka") "Lil Blazer," aka "Lil B," aka "LB," aka "Little  
6 Blaze," aka "Mona" ("J. GARCIA"), knowingly possessed the following  
7 firearm and ammunition, each in and affecting interstate and foreign  
8 commerce:

9 1. a Taurus TCP PT738 model .380 caliber pistol, bearing  
10 serial number 87845C; and

11 2. six rounds of .380 caliber ammunition with headstamp "JAG."

12 Such possession occurred after defendant J. GARCIA had been  
13 convicted of at least one of the following felony crimes, each  
14 punishable by a term of imprisonment exceeding one year:

15 1. Prisoner in Possession of a Weapon, in violation of  
16 California Penal Code Section 4502(a), in the Superior Court of the  
17 State of California, County of Los Angeles, case number BA188518, on  
18 or about August 3, 1999;

19 2. Assault, in violation of California Penal Code Section  
20 4501, in the Superior Court of the State of California, County of Los  
21 Angeles, case number VA051891, on or about June 2, 2000;

22 3. Carjacking, in violation of California Penal Code Section  
23 215(a), in the Superior Court of the State of California, County of  
24 Los Angeles, case number VA070813, on or about February 25, 2003;

25 4. Robbery, in violation of California Penal Code Section 211,  
26 in the Superior Court of the State of California, County of Los  
27 Angeles, case number VA070813, on or about February 25, 2003.

1 FORFEITURE ALLEGATION ONE

2 [18 U.S.C. § 1963(a)(3) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Section 1963, and Title 28, United States Code,  
7 Section 2461(c), in the event of any defendant's conviction under  
8 Count One of this Indictment.

9 2. Any defendant so convicted shall forfeit to the United  
10 States of America the following:

11 a. Any property constituting, or derived from, any  
12 proceeds which the person obtained, directly or indirectly, as a  
13 result of any such offense;

14 b. Any interest in, security of, claim against, or  
15 property or contractual right of any kind affording a source or  
16 influence over, any enterprise which the convicted defendant has  
17 established, operated, controlled, conducted, or participated in the  
18 conduct of, as a result of any such offense; and

19 c. To the extent such property is not available for  
20 forfeiture, a sum of money equal to the total value of the property  
21 described in subparagraphs a. and b.

22 3. Pursuant to Title 21, United States Code, Section 853(p),  
23 as incorporated by Title 18, United States Code, Section 982(b), any  
24 defendant so convicted shall forfeit substitute property, up to the  
25 value of the property described in the preceding paragraph if, as the  
26 result of any act or omission of any defendant, the property  
27 described in the preceding paragraph or any portion thereof (a)  
28 cannot be located upon the exercise of due diligence; (b) has been

1 transferred, sold to, or deposited with a third party; (c) has been  
2 placed beyond the jurisdiction of the court; (d) has been  
3 substantially diminished in value; or (e) has been commingled with  
4 other property that cannot be divided without difficulty.

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1 FORFEITURE ALLEGATION TWO

2 [21 U.S.C. § 853 and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 21,  
6 United States Code, Section 853, and Title 28, United States Code,  
7 Section 2461(c), in the event of any defendant's conviction under any  
8 of Counts Four through Twenty-Two of this Indictment.

9 2. Any defendant so convicted shall forfeit to the United  
10 States of America the following:

11 a. All right, title, and interest in any and all  
12 property, real or personal, constituting, or derived from, any  
13 proceeds obtained, directly or indirectly, from any such offense;

14 b. All right, title, and interest in any and all property  
15 used to facilitate, or intended to be used to facilitate the  
16 commission of any such offense; and

17 c. To the extent such property is not available for  
18 forfeiture, a sum of money equal to the total value of the property  
19 described in subparagraphs a. and b. above.

20 3. Pursuant to Title 21, United States Code, Section 853(p),  
21 as incorporated by Title 18, United States Code, Section 982(b), any  
22 defendant so convicted shall forfeit substitute property, up to the  
23 value of the property described in the preceding paragraph if, as the  
24 result of any act or omission of any convicted defendant, the  
25 property described in the preceding paragraph or any portion thereof  
26 (a) cannot be located upon the exercise of due diligence; (b) has  
27 been transferred, sold to, or deposited with a third party; (c) has  
28 been placed beyond the jurisdiction of the court; (d) has been

1 substantially diminished in value; or (e) has been commingled with  
2 other property that cannot be divided without difficulty.

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1 FORFEITURE ALLEGATION THREE

2 [18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Section 924(d)(1) and Title 28, United States  
7 Code, Section 2461(c), in the event of any defendant's conviction  
8 under any of Counts Twenty-Three through Twenty-Six of this  
9 Indictment.

10 2. Any defendant so convicted shall forfeit to the United  
11 States of America the following property:

12 a. All right, title, and interest in any firearm or  
13 ammunition involved in or used in any such offense.

14 b. To the extent such property is not available for  
15 forfeiture, a sum of money equal to the total value of the property  
16 described in subparagraph a. above.

17 3. Pursuant to Title 21, United States Code, Section 853(p),  
18 as incorporated by Title 18, United States Code, Section 982(b), the  
19 convicted defendant shall forfeit substitute property, up to the  
20 value of the property described in the preceding paragraph if, as the  
21 result of any act or omission of the convicted defendant, the  
22 property described in the preceding paragraph or any portion thereof  
23 (a) cannot be located upon the exercise of due diligence; (b) has  
24 been transferred, sold to, or deposited with a third party; (c) has  
25 been placed beyond the jurisdiction of the court; (d) has been

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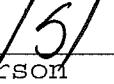
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1 substantially diminished in value; or (e) has been commingled with  
2 other property that cannot be divided without difficulty.

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4 A TRUE BILL

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6   
7 Foreperson

8 NICOLA T. HANNA  
9 United States Attorney

10   
11 LAWRENCE S. MIDDLETON  
12 Assistant United States Attorney  
13 Chief, Criminal Division

14 KEVIN M. LALLY  
15 Assistant United States Attorney  
16 Chief, Organized Crime Drug  
17 Enforcement Task Force Section

18 BENJAMIN R. BARRON  
19 Assistant United States Attorney  
20 Deputy Chief, Organized Crime  
21 Drug Enforcement Task Force  
22 Section

23 CHRISTOPHER C. KENDALL  
24 Assistant United States Attorney  
25 Organized Crime Drug Enforcement  
26 Task Force Section